

Appendix D

AFFIRMATIVELY FURTHERING FAIR HOUSING





A. Affirmatively Furthering Fair Housing

Beginning January 1, 2019, AB 686 established new requirements for all California jurisdictions to ensure that local laws, programs, and activities affirmatively further fair housing. All Housing Elements due on or after January 1, 2021 must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Further Fair Housing Final Rule of July 16, 2015.

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor. Under State law, affirmatively further fair housing means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. These characteristics can include, but are not limited to race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

On January 23, 2017, the City and Pomona Housing Authority (PHA) conducted an Assessment of Fair Housing (AFH). The City’s AFH included the following:

- Analysis of HUD-provided data, local data, and other information.
- Engaging the community in fair housing planning.
- Consultation with the agencies and organizations identified by Federal consultation requirements.
- Assessment of fair housing issues and contributing factors.
- Identification of fair housing priorities, goals, and recommendations to address issues.
- Making any proposed analysis and the relevant documents, including the HUD-provided data and any other data to be included in the AFH, available to the public.
- A public review draft of the AFH for comment.

1. *Fair Housing Outreach*

The AFH contains a citywide analysis of demographics, housing, and specifically fair housing issues in Pomona. The City’s demographics and income profile, household and housing characteristics, housing cost and availability, and special needs populations were discussed in **Appendix A.1: Housing Needs Assessment**.

AFH Outreach

The city employed community outreach efforts to publicize the development of the AFH and to engage the community by garnering relevant feedback on housing issues. Outreach efforts included the following:

- Citizen community meetings
- Meetings with Pomona Housing Authority (PHA) tenants
- Meetings with PHA Resident Advisory Board Members
- Consultation with local housing agencies
- Distribution of a Housing Discrimination Survey



Community Meetings

The City conducted community meetings at Pomona City Hall from October 2016 through January 2017. Meetings were publicized through the following:

- Distribution of flyers
- Information postings
- Email blasts
- Citywide flyer inserts
- Information on the City's webpage
- Notices in local newspapers

Additionally, input from housing and service providers, housing professionals, local religious organizations, and local schools was solicited in early 2016 to ensure that the fair housing concerns of low and moderate income and special needs residents were addressed.

Housing Discrimination Survey

The City released a Housing Discrimination Survey throughout the community and on the City's webpage, beginning in October 2016. Additionally, door to door survey distribution was conducted in Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs). The Survey was available in both English and Spanish. Overall, a total of 724 persons responded to the Fair Housing Survey.

Community Input

The City garnered community input through the process and identified the following fair housing issues, as noted by the community:

- Disproportionate Housing Needs of Protected Classes and Lack of Affordable Housing
- Use of Housing Choice Vouchers (HCV) (Formerly known as Section 8 Program)
- Housing Discrimination Based on Race and Disabilities

AFH Identified Fair Housing Issues

The AFH intended to identify fair housing issues in the City of Pomona through engagement and analysis of relevant data. Within the legal framework of Federal and State laws and based on the guidance provided by the HUD Fair Housing Planning Guide, impediments to fair housing choice can be defined as:

Any actions, omissions, or decisions taken because of age, race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of age, race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.

Development of the AFH involved an examination of the following seven HUD-required fair housing issues and use of a template format AFH tool for narrative input:

- Segregation/Integration
- Disparities in Access to Opportunity
- Disability and Access Issues
- Disproportionate Housing Needs



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- Publicly Supported Housing Location and Occupancy
- Fair Housing Enforcement, Outreach Capacity and Resources
- Racially or Ethnically Concentrated Areas of Poverty (R/ ECAPs)

The analysis yielded the following:

- **Access to Decent, Affordable, and Adequate Housing:** Impediments including availability of affordable units in range of unit sizes, location and type of affordable housing, lack of affordable, accessible housing in range of unit sizes, and location of accessible housing.
- **Public Policies and Regulatory Constraints to Housing Options:** Impediments include land use and zoning laws which limit accessibility and availability of housing.
- **Public/Private Investment:** Impediments include lack of private investments in specific neighborhoods and lack of public investments in specific neighborhoods.
- **Fair Housing Services, Outreach/Education, and Enforcement:** Impediments include lack of local private fair housing outreach and enforcement, lack of local public fair housing enforcement, private discrimination, and source of income discrimination.
- **Transportation and Access to Services:** Impediments include access to financial services, lending discrimination, location of employers, location of environmental health hazards and location of proficient schools and school assignment policies.

Previously Identified Local Contributing Factor

The AFH also identified the following local contributing factors perceived to be creating, contributing, perpetuating, or increasing the severity of fair housing issues:

- **Disproportionate Housing Needs of Protected Classes and Lack of Affordable Housing:** Housing Discrimination Based on Race and Disabilities: Residents commented that housing discrimination based on race and disabilities persist in the community. Minority, elderly, and disabled households in Pomona are disproportionately represented in the low-income group, which subsequently leads to a lack of housing choice. While the City has been diligently working to expand the affordable housing inventory, the needs in the community remain unmet due to diminished funding.
- **Use of Housing Choice Vouchers (Section 8):** A total of 1,110 households in Pomona rely on the assistance to afford decent and adequate housing; including low-income families, persons experiencing homelessness, veterans, transitional aged youth, disabled and homeless families, victims of domestic violence, and persons/households at-risk of housing instability. The HCV program is in high demand with a long waiting list of applicants. Not only do applicants have to wait a long time to receive a voucher, but once a voucher is available, it often takes a long time to find a landlord who would accept it. Voucher use is primarily concentrated in the City's central and eastern neighborhoods.
- **Housing Discrimination Based on Race and Disabilities:** Residents commented that housing discrimination based on race and disabilities persist in the community.

2021-2029 Housing Element Update Outreach

In order to ensure the Housing Element reflects and meets the needs of the Pomona community, public input was sought throughout the Housing Element update process. Multiple rounds of outreach were conducted using diverse methods. Due to the COVID-19 pandemic, which occurred throughout the entirety



of the Housing Element update and resulted in in-person activities being prohibited, all outreach efforts were shifted to virtual formats. As part of the 2021-2029 Housing Element Update, the City held a variety of workshops, meetings, and engagement opportunities to solicit input and feedback from the community. The engagement process was designed to be accessible to all persons, therefore, every event and all information was provided in both English and Spanish. Additionally, the City provided details on the Housing Element through presentations provided at local organizations, community meetings and religious events.

A detailed overview of all outreach efforts is provided in **Appendix A.2** of this Housing Element.

2021-2029 Housing Element Summary of Comments

Comments received during all stakeholder interviews, webinars, surveys, office hours, and City meetings can be grouped into the following topics:

- **Diverse Housing Challenges**
 - Pomona has unique housing challenges for its population.
 - There are increasing and changing racial Demographics.
 - There is are high rates of college students and recent graduates.
 - Pomona's households are increasingly female-headed, non-family, large, and multi-generational.
 - Overall, household income levels in Pomona are low and there is a need for more accessible and affordable housing.
 - Housing needs to address disabilities, extreme poverty, and homelessness.
- **Limited Housing Stock and Displacement**
 - The options for housing in Pomona are limited to mostly single detached units on single lots.
 - There is a lot of multigenerational living in Pomona but there isn't affordable housing.
 - There is limited availability of needed affordable housing.
 - The community has serious concerns about displacement, unstable rent prices, tenant protections, and housing affordability.
- **Environmental Justice**
 - The community identified key discrepancies in environmental quality throughout Pomona.
 - Existing residential uses located within the City's industrial zones face increased environmental justice concerns and pollution burden.
- **Neighborhood Conditions**
 - The community expressed various needs related to maintaining a high quality of life in their households and neighborhoods.
 - Community members, City Council and Planning Commission noted the importance of smart growth and the necessity to provide housing near jobs, open space and other community resources.

During the House Element update, all comments received were considered. Goals, policies and programs of the Housing Element were developed after the majority of the outreach had been completed so that they reflected community feedback. A summary of how each common topic comment was incorporated is as follows:



- **Diverse Housing Challenges:** Several programs were identified to address the unique and varying needs of the diverse Pomona community. Most notably, the City developed Program 1.2A to rework and entirely updated the Pomona Zoning Code for both consistence with state law and requirement, but also to remove potential discriminator development practices and support a wide variety of housing development. Additionally, the City identified Program, 2.6B to develop a public online housing dashboard to provide housing resources and access information. Additional programs to address diverse housing challenges include: Programs 1.4A, 2.1A, 2.1B, 2.1C, 2.2B, 2.2C, 2.4A and 3.5A.
- **Limited Housing Stock and Displacement:** Many of the City’s goals and policies focus on both maintaining existing housing stock and increasing housing supply in Pomona. Specifically, the City has developed the following programs support the maintenance of existing housing: Programs 2.3A, 2.3B, 2.3C, 2.3D, 2.3E, 2.6A and 4.3A. Each of these programs focuses on providing support to property owners to preserve housing stock and maintain existing affordability covenants. Additionally, the City developed Programs 1.3A, 1.4A, 1.4B, 1.4C, 2.4B, 2.4C, and 3.1A to reduce governmental constraints on housing development, support affordable housing development and increase housing opportunity throughout the City.
- **Environmental Justice:** Through engagement and data analysis, the City found that environmental justice was a primary concern among residents of lower income households. Therefore, the City created Program 5.1A. The program focuses on developing an Environmental Justice Element to be integrated into the Pomona General Plan. The program will initiate and adopt a new element that directly addresses environmental justice through clear policy language that supports outcomes that reduce pollution burden and exposure to harmful pollutants for all Pomona households.
- **Neighborhood Conditions:** Smart growth was a key theme identified by stakeholders, residents, and City decision makers. During community engagement, participants noted that access to jobs, parks and open space, and transit and transportation options were importance when considering where housing should go. The City developed a robust sites analysis that identifies appropriate lots throughout the City to increase housing which is supported by infrastructure, open space, essential retail and transit (Program 1.1A and 1.1C). Additionally, to improve neighborhood conditions and develop sense of place throughout the community, the City developed Programs 4.1A, 4.1B, 4.2A, 4.4A and 4.5A.

B. Assessment of Fair Housing Issues

1. *Lending Practices*

Table D-1 below displays the disposition of loan applications for the Los Angeles-Long Beach-Glendale MSA/MD, per the 2019 Home Mortgage Disclosure Act report. According to the data, applicants in the 120% MSA/MD median income range or more had the highest rates of loans approved. Of that income category, applicants who reported White had the highest percentage of approval and the number of applications. Applicants in the less than 50% MSA/MD median income range experienced higher percentages of denied loans than other income categories. Key findings, as shown in the table below include:



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- Low Income applicants (less than 50 percent of the MSA/MD median income) are more likely to have a loan application denied, the highest rates of denial were among Native Hawaiian/Pacific Islander (67 percent) and American Indian and Alaska Natives (58.3 percent).
- Above moderate-income applicants (100+ percent of the MSA/MD median income) experienced the highest rates of loan approvals. However, Native Hawaiian/Pacific Islander and American Indian and Alaska Native applicants in the above moderate-income category still experienced high rates of loan denial (above 30 percent denial for applicants making 100-119% of the MSA/MD median income and above 20 percent denial for applicants making 170%+ of the MSA/MD median income).
- Across all income categories, applicants who identified as White had the highest rates of loan approvals.
- Overall, applicants who identified as white made the majority of all loan applications, followed by applicants who identified as Hispanic or Latino.

Table D-1: Disposition of Loan Applications by Race/Ethnicity and Income - LOS ANGELES-LONG BEACH-GLENDALE MSA/MD				
Applications by Race/Ethnicity	Percent Approved	Percent Denied	Percent Other	Total (Count)
LESS THAN 50% OF MSA/MD MEDIAN INCOME				
American Indian and Alaska Native	24.2%	57.3%	18.5%	178
Asian	36.5%	42.1%	21.3%	1,932
Black or African American	42.0%	28.8%	29.2%	2,120
Native Hawaiian or other Pacific Islander	20.3%	67.0%	12.6%	182
White	44.1%	30.9%	24.9%	11,384
Hispanic or Latino	39.0%	36.2%	24.8%	6,559
50-79% OF MSA/MD MEDIAN				
American Indian and Alaska Native	37.0%	43.3%	19.7%	238
Asian	44.3%	34.1%	21.6%	2,873
Black or African American	42.8%	32.2%	25.0%	2,367
Native Hawaiian or other Pacific Islander	22.8%	62.2%	15.0%	254
White	49.0%	28.3%	22.7%	14,902
Hispanic or Latino	44.6%	32.5%	22.9%	10,611
80-99% OF MSA/MD MEDIAN				
American Indian and Alaska Native	41.4%	33.3%	25.2%	111
Asian	51.1%	27.4%	21.5%	1,611
Black or African American	47.3%	27.3%	25.4%	1,124
Native Hawaiian or other Pacific Islander	35.5%	47.3%	17.2%	93
White	53.6%	23.4%	23.0%	6,887
Hispanic or Latino	50.1%	26.7%	23.2%	4,974
100-119% OF MSA/MD MEDIAN				
American Indian and Alaska Native	42.0%	32.1%	25.9%	352
Asian	60.5%	19.9%	19.5%	5,869
Black or African American	49.9%	23.7%	26.3%	3,579
Native Hawaiian or other Pacific Islander	40.9%	39.9%	19.2%	291
White	60.1%	17.9%	22.0%	25,143
Hispanic or Latino	56.4%	20.7%	22.9%	16,541
120% OR MORE OF MSA/MD MEDIAN				
American Indian and Alaska Native	48.9%	23.9%	27.2%	871
Asian	62.9%	14.3%	22.8%	35,764
Black or African American	55.0%	19.5%	25.5%	11,611



**Table D-1: Disposition of Loan Applications by Race/Ethnicity and Income -
LOS ANGELES-LONG BEACH-GLENDALE MSA/MD**

Applications by Race/Ethnicity	Percent Approved	Percent Denied	Percent Other	Total (Count)
Native Hawaiian or other Pacific Islander	54.2%	23.3%	22.5%	1,052
White	64.9%	13.5%	21.7%	135,203
Hispanic or Latino	60.4%	16.5%	23.1%	42,722
TOTAL	59%	18.5%	22.6%	347,398

Source: Consumer Financial Protection Bureau, Disposition of loan applications, by Ethnicity/Race of applicant, 2019.

2. Fair Housing Enforcement and Outreach Capacity

The City of Pomona provides access to fair housing assistance through the Housing Rights Center. The Housing Rights Center (HRC) is the nation's largest non-profit civil rights organization dedicated to securing and promoting Fair Housing. HRC actively supports and promotes freedom of residence through education, advocacy, and litigation, to the end that all persons have the opportunity to secure the housing they desire and can afford, without regard to their race, color, religion, gender, sexual orientation, national origin, familial status, marital status, disability, ancestry, age, source of income or other characteristics protected by law. The City of Pomona is in compliance with existing fair housing laws. There have been no findings against the City of Pomona from the U.S. Department of Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity (FHEO) or from the State Department of Fair Employment and Housing (DFEH).

HRC provides programs and services focused on eliminating housing discrimination, providing general housing assistance, and counseling, education, and outreach activities to residents in the Los Angeles County. In recent years, the Housing Rights Center has performed the following in the region:

- Housing Counseling
- Discrimination Investigation & Disability Accommodations
- Community Workshops and Events
- Monthly Rental Listing

The City of Pomona also provides informational fact sheets and flyers regarding fair housing rights, in both Spanish and English. The City is committed to mitigating fair housing issues and discrimination in the community and increasing fair housing access and opportunity.

The City of Pomona and the HRC investigate fair housing complaints within the City. Periodic testing is also done in conjunction with fair housing investigations. The Investigations Department of HRC conducts fact finding investigations and proposes potential solutions for victims of housing discrimination. HRC case resolutions include:

- Mediation
- Conciliation
- Referral to state and federal administrative agencies, or
- Referral to HRC's Litigation Department



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From 2009 to 2016, HRC provided direct services to 2,795 persons, of which 188 inquiries were individuals alleging housing discrimination in Pomona. After thoroughly screening and counseling the 188 complaints, HRC opened 58 fair housing cases. The top three discrimination biases were physical disability (53 percent), mental disability (19 percent), and race (14 percent). HRC conducted investigations on the 58 cases. In their findings, about 64 percent of investigations found the cases sustained allegations, while 15 percent had inconclusive evidence, and another 21 percent were still pending. Nearly 45 percent of the cases with evidence of discrimination closed as successfully conciliated resulting from both the complainant and respondent agreeing to a resolution. In 21 percent of cases no enforcement action was possible. In the remaining cases the client withdrew (seven percent of all cases), and roughly 28 percent of cases were still pending.

During the update of this Housing Element, the City reached out to all agencies with track and record fair housing complaints, for 2018 through 2021 the following fair housing data is available:

- From 2018-19 30 Pomona residents were served, a majority of which involved discrimination due to a physical disability.
- From 2018-2019 30 fair housing complaints were made; 10 of the fair housing complaints were remedied via reasonable accommodation and 2 complaints underwent investigation.
- From 2019-2020 28 Pomona residents were served, a majority of which involved discrimination due to a physical disability or income.
- From 2019-2020 28 fair housing complaints were made; 2 of the fair housing complaints were remedied via reasonable accommodation and 8 complaints underwent investigation
- From 2020-2021 33 Pomona residents were served, a majority of which involved discrimination due to a physical disability
- From 2020-2021 33 fair housing complaints were made; 1 of the fair housing complaints was remedied via reasonable accommodation and 1 complaint underwent investigation.

Table D-2: Fair Housing		
2018-2019		
Activity	# of Served Clients For Fiscal Year	Type of Service Provided and Summary/Outcome
Investigations	12	8 Physical Disability, 2 Mental Disability 1 Gender, 1 Race
Remedies	12	10 Reasonable Accommodations, 2 Investigations
Tests of Fair Housing	0	N/A
Findings	9	9 Sustain Allegations, 3 Inconclusive Evidence
Settlements	0	N/A
Judgements	0	N/A
Complaints	30	21 Physical Disability, 5 Mental Disability, 1 Familial Status, 1 Gender, Race
2019-2020		
Activity	# of Served Clients For Fiscal Year	Type of Service Provided and Summary/Outcome
Investigations	10	7 Source of Income (Section 8), 1 Race 1 Mental Disability, 1 Physical Disability
Remedies	10	8 Investigations, 2 Reasonable Accommodations



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Tests of Fair Housing	7	7 Phone Tests
Findings	10	5 Sustains Allegations , 4 Inconclusive Evidence , 1 Pending
Settlements	0	N/A
Judgements	0	N/A
Complaints	28	8 Physical Disability, 7 Source of Income (Section), 6 Mental Disability, 2 Race , 1 Color , 1 Arbitrary
2020-2021		
Activity	# of Served Clients For Fiscal Year	Type of Service Provided and Summary/Outcome
Investigations	2	1 Physical Disability, 1 Source of Income (Section 8)
Remedies	2	1 Investigation, 1 Reasonable Accommodation
Tests of Fair Housing	0	N/A
Findings		1 Pending, 1 Sustains Allegation
Settlements	0	N/A
Judgements	0	N/A
Complaints	33	20 Physical Disability, 5 Mental Disability, 4 Race 1 Familial Status, 1 Marital Status, 1 Sexual Orientation, 1 Source of Income (Section 8)
<i>Source: City of Pomona, Inland Fair Housing and Mediation Board, Housing Rights Center.</i>		

3. Analysis of Federal, State, and Local Data and Local Knowledge

Summary of Local Knowledge

Fair housing issues may exist in Pomona due to development patterns, population growth, economic changes, or other external demographic shifts. Additionally, programs and policies shape cities and can exacerbate fair housing issues that are brought on by other external factors. The City of Pomona is a diverse community that has shifted and changed over the last 100 plus years. Based on the City's records, Pomona began as a 13 square mile city in 1888 and as of 2022 is nearly 23 square miles. Since 1888, the City has undergone 78 individual annexations totaling roughly 10 additional square miles of land. The spatial patterns associated with these annexations may have a correlation to the demographics and socioeconomics and environmental burden of existing neighborhoods.

For example, the area generally west of Dudley Street and South of Interstate 10 and East of Interstate 71 was not originally part of Pomona but was slowly brought into the City through a series of 24 annexations (shown in **Figure D-1, Inset A**), from 1952 to 1980. As each of these 24 plots of land were under Los Angeles County unincorporated regulation, it is reasonable to conclude that it both led to an uneven and scattered spatial pattern of roads, infrastructure, and cohesive neighborhood formation, and did not represent a coordinated or intentional investment from Pomona to support these neighborhoods into Cityhood. Moreover, early annexations were ultimately burdened by expansions of multiple Interstate highways, which brought additional vehicular lane traffic closer to neighborhoods and, over time, exacerbated pollution burden. For example, the Westmont neighborhood in West Pomona, brought into the City in the



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1940's (Annexation No. 2 and No. 4 - **Figure D-1, Inset B**), was ultimately divided by the Interstate 71, which has subsequently increased in capacity and split the neighborhood into western and eastern regions.

Similarly, in South Pomona, a series of annexations (No's 3, 5, 7, 11, 19, and 22- **Figure D-1, Inset C**) expanded the City south of Olive Street, leading to the construction of tract housing in the 1950's. These homes were ultimately adjacent to an expanding Interstate 60, which brought pollution burden closer to these communities. It is important to note, though, that it may not have been foreseen at the time that placement of neighborhoods near burgeoning Interstates would create known pollution burdens, and much of the research and evidence from the last 30 years has aided the City in better understanding the impact of near highway pollution on Pomona's communities, as further evidenced in the CalEnviroScreen modeling by the State of California Office of Environmental Health and Hazard Assessment (OEHHA).

In contrast, the annexation of Phillips Ranch into the City in 1968 was a more intentional, purposeful addition insofar as it represented a master planned community built over phases, driven by specific developers (See No. 62). This annexation represented mostly single unit tract housing that ultimately led to the proliferation of single-family home sales through the 1970s, 80s, and 90s, largely coordinated and planned, including the provision of roads, utilities, open space, and infrastructure.

Moreover, the City has evidence to show the "red lining" of neighborhoods, which restricted home ownership opportunities within specific neighborhoods by race, was practiced in Pomona. The City, in coordination with the Claremont Lincoln University, cataloged this redlining history in a 2021 Story Map entitled "Structural Racism and Land Use and Policies in Pomona, California."¹ In the Los Angeles County redlining map, cities had their residential neighborhoods graded. The Homeowners Loan Corporation (HOLC) graded 200 metropolitan cities across the United States. Areas of Pomona were graded from A through D, with A being more desirable for investment. Again, this desirability included race as a factor. For example, the area south of Pomona Civic Center generally bounded south of Seventh Street and Grand from north and south and White Avenue and Thomas Street east to west was graded "D: Hazardous." The description from HOLC states that "this is another area which has degenerated due to infiltration of Mexicans. It differs from the other Mexican district in Pomona in that the improvements were not built in the typical Mexican farm labor shack type but are the relics of a once acceptable neighborhood." In contrast, the area known today as Ganesha Hills, graded "A: Best," described the area as "provides for the architectural supervision of plans for improvements and protects against racial hazards." The City's Story Map concludes that "these grades are a great representation of the tools of redlining: making it difficult or impossible for people in certain areas to access mortgage financing and thus become homeowners. Redlining directed both public and private capital to native-born white families and away from African American and immigrant families. As home ownership was arguably the most significant means of intergenerational wealth building in the United States in the 20th century, these redlining practices from eight decades ago had long-term effects in creating wealth inequalities that we still see today."

In addition to redlining and annexation history, the City in the 1950's zoned land in the eastern edge of the City as light and general industrial, which led to the proliferation of warehouses, trucking facilities, and

¹ <https://storymaps.arcgis.com/stories/c5b6b05808014b5a9e24cf82b2a4dd1b>



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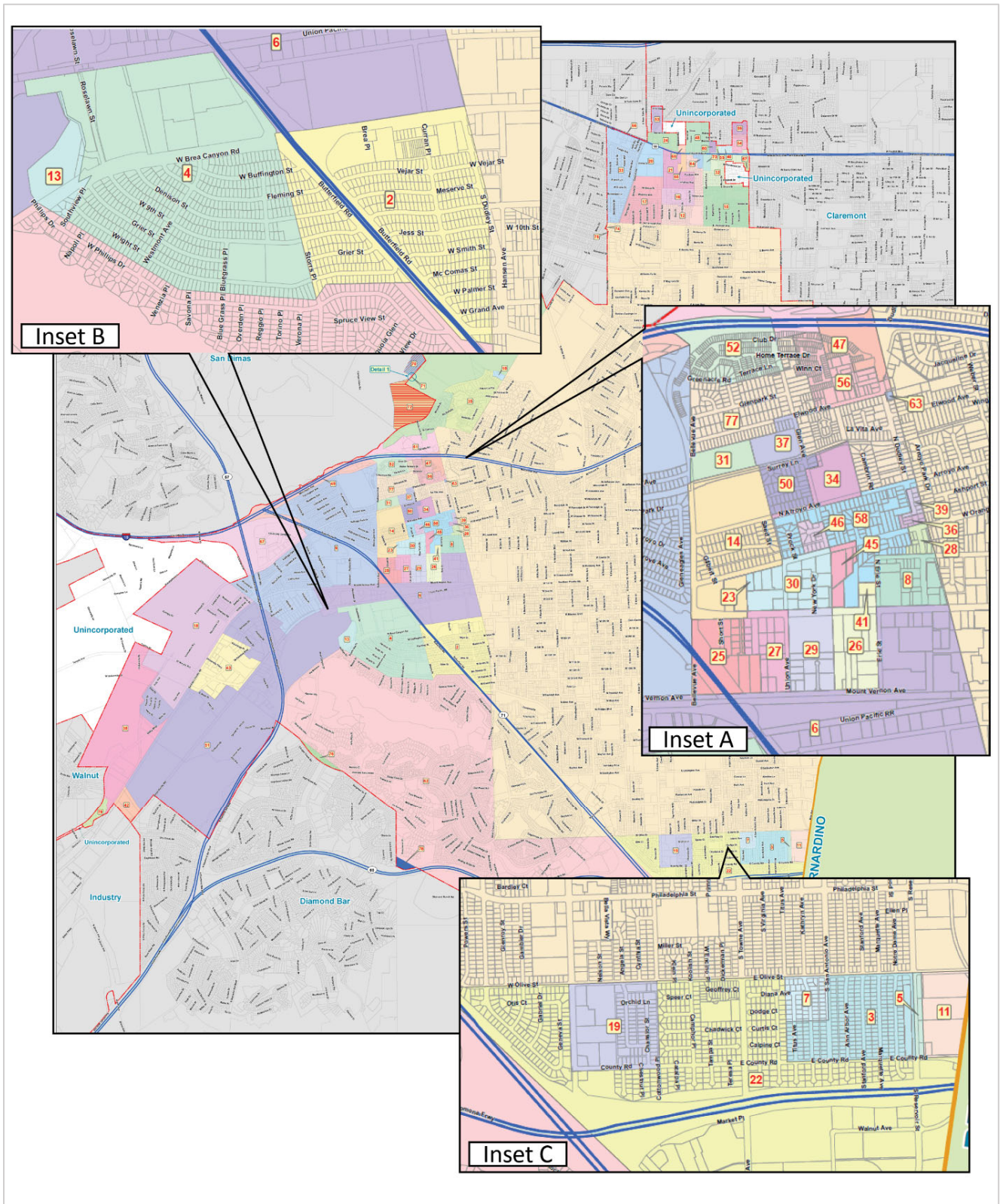
waste and recycling facilities. However, this zoning was on land that also included existing single and multi-unit housing, which ultimately increased the pollution burden on these legally non-conforming homes.

In summary, a number of practices, policies and economic and demographic shifts may have created or exacerbated fair housing conditions and issues in the City of Pomona. A further analysis using available State and Federal data is below, followed by a summary of contributing factors to fair housing.



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Figure D-1: City of Pomona, Annexations



Source: City of Pomona, Annexation Map.



Integration and Segregation Patterns and Trends

The dissimilarity index is the most commonly used measure of segregation between two groups, reflecting their relative distributions across neighborhoods (as defined by census tracts). The index represents the percentage of the minority group that would have to move to new neighborhoods to achieve perfect integration of that group. An index score can range in value from 0 percent, indicating complete integration, to 100 percent, indicating complete segregation. An index number above 60 is considered to show high similarity and a segregated community.

It is important to note that segregation is a complex topic, difficult to generalize, and is influenced by many factors. Individual choices can be a cause of segregation, with some residents choosing to live among people of their own race or ethnic group. For instance, recent immigrants often depend on nearby relatives, friends, and ethnic institutions to help them adjust to a new country. Alternatively, when White residents leave neighborhoods that become more diverse, those neighborhoods can become segregated. Other factors, including housing market dynamics, availability of lending to different ethnic groups, availability of affordable housing, and discrimination can also cause residential segregation.

Data from the Brown Diversity and Disparities report² shows that from 1980 through 2010 the City of Pomona became increasingly diverse. In 1980, the Non-Hispanic White population totaled 46.7 percent of the overall population and decreased to about 13.5 percent in 2010. On the other hand, in the same period, the Hispanic population increases from 30.5 percent (1980) to 70.5 percent (2010). Additionally, while the total populations for those who identified as Asian increased from 1980 to 2020, 2.4 percent to 9.1 percent, the total population of those who are Non-Hispanic Black decreased from 18.6 percent to 7.3 percent. In 2019, the Non-Hispanic Black population totaled about 5.3 percent of the population.³ The continued decrease in the Black population and increase in the Hispanic population is consistent with demographics trends for the greater Los Angeles region. In 1980, the Non-Hispanic Black population equaled 12.4 percent of the overall population of the Los Angeles Metropolitan Statistical Area (MSA) and the Hispanic population totaled 27.7 percent. By 2010, the Black population totaled 8.9 percent whereas the Hispanic population increased to 47.7 percent.⁴ According to 2019 ACS data, the total Non-Hispanic Black population in Los Angeles was 7.7 percent and the total Hispanic population increased to 48.6 percent.

Figure D-2 shows the dissimilarity between each of the identified race and ethnic groups and Pomona's White population, the higher scores indicate higher levels of segregation among those race and ethnic group. The White population within Pomona make up most of the City's population at approximately 47.5 percent, where 10.8 percent are White (non-Hispanic or Latino) according to 2019 American Community Survey (ACS) estimates.

The race and ethnic groups with the highest scores were the Native Hawaiian Population (53.4) and Hispanic population (44.9). Additionally, those who reported Other and the American Indian population

² Spatial Structures in the Social Sciences, Brown University. City of Pomona. Accessed Online: January 17, 2022.

³ American Community Survey, 5-Year Estimates, Demographic and Housing Estimates, 2019.

⁴ Spatial Structures in the Social Sciences, Brown University. Los Angeles-Long Beach-Glenda MSA. Accessed Online: January 17, 2022.

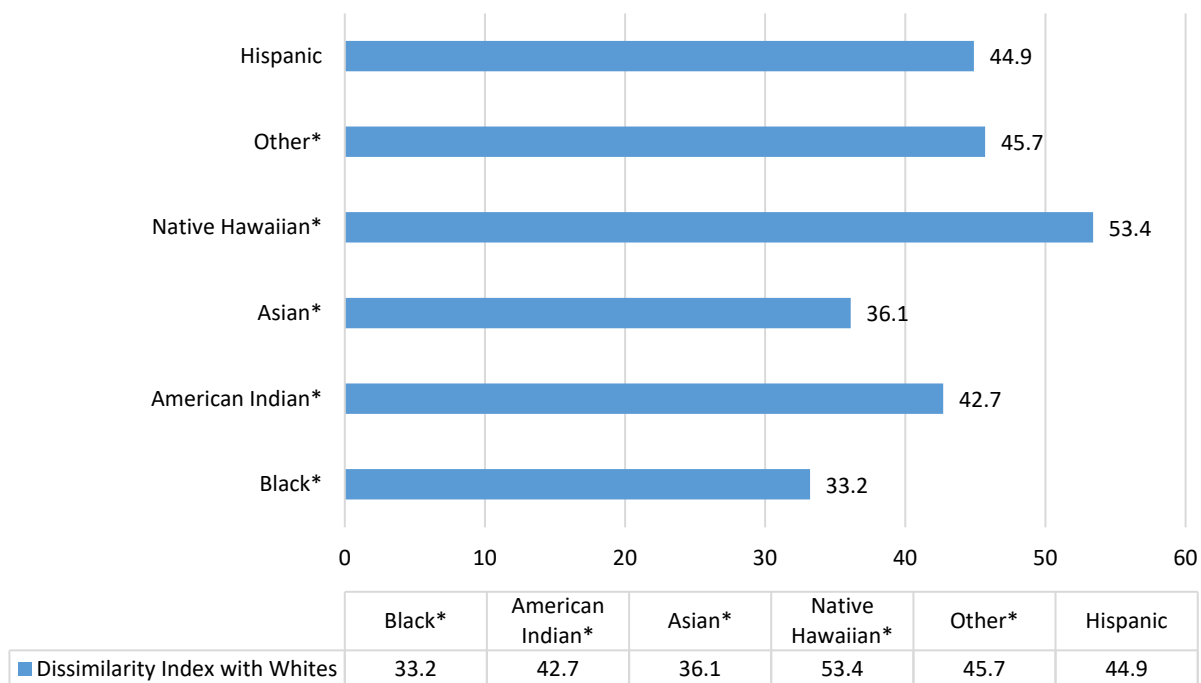


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had dissimilarity indices of 45.7 and 42.7 respectively. These scores correlate directly with the percentage of people within that racial or ethnic group that would need to move into a predominately White census tract in order to achieve a more integrated community. For instance, 53.4 percent of the Native Hawaiian population would need to move into predominately White census tract areas to achieve “perfect” integration or 44.9 percent of the Hispanic population would need to move into the predominantly White census tract areas for perfect integration.

The Department of Housing and Community Development (HCD) considers dissimilarity index scores above 30 as moderate segregation and scores above 60 high segregation. While the City of Pomona has no racial or ethnic populations with a dissimilarity index above 60, all populations have a score above 30, meaning all groups experience moderate segregation from the White population. While segregation may be a result of ethnic enclaves or persons of similar cultures living nearby, there is often increased likelihood that segregated areas have fewer access to essential resources. Moderate levels of segregation in Pomona likely increase fair housing issues for the nonwhite population as they may be further from essential retail, lack access to transit or have reduced mobility options, and may be further from economic opportunity or job centers. As a part of Pomona’s efforts to further fair housing, the City will provide increased targeted outreach to the City’s minority residents.

Figure D-2: Dissimilarity Index with White Population in Pomona



Census Scope, Social Science Data Analysis Network

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)

To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must



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have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line.⁵ Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40 percent or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

Location of residence can have a substantial effect on mental and physical health, education opportunities, and economic opportunities. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation.⁶ However, these areas may also provide different opportunities, such as ethnic enclaves providing proximity to centers of cultural significance, or business, social networks, and communities to help immigrants preserve cultural identity and establish themselves in new places. Overall, it is important to study and identify these areas in order to understand patterns of segregation and poverty in a City.

Figure D-3 below displays the R/ECAP analysis of the Pomona area. The figure shows there are three pockets of racially or ethnically concentrated areas of poverty in the City. The map identifies census tracts 402702, 402304, and 403200 as R/ECAP areas. **Table D-3** below is a demographic breakdown of each tract.

Table D-3: R/ECAP Demographics by Census Tract								
Census Tract ID	Median Family Income %	2020 Median Family Income	Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
4027.02	50.25	\$77,300	\$38,843	6,487	94.17	6,109	291	968
4023.04	54.38	\$77,300	\$42,036	4,041	94.06	3,801	277	775
4032.00 ¹	NA	\$77,300	NA	738	50.41	372	0	0
Notes:								
1. Census tract 4032.00 has a low density population and is sparsely populated, while this census tract may have qualified as a R/ECAP based on the available data the population statistics reflect a more rural setting as there are no owner occupied units and no data for income.								
Source: Federal Financial Institutions Examination Council, 2020 FFIEC Census Report – Summary Census Demographic Information.								

For comparison, **Table D-4** provides the same demographic breakdown for a moderate resource and high income census tract, census tract 403317. Comparative analysis identifies the following:

- The median family income in census tract 403317 was 150% greater than Pomona's 2020 median family income, which is about three times greater than the 2020 median family incomes of the R/ECAP census tracts.

⁵ Wilson, William J. (1980). *The Declining Significance of Race: Blacks and Changing American Institutions*. Chicago: University of Chicago Press

⁶ Schulz, A. J., Williams, D. R., Israel, B. A., & Lempert, L. B. (2002). Racial and spatial relations as fundamental determinants of health in Detroit. *The Milbank quarterly*, 80(4), 677–iv. <https://doi.org/10.1111/1468-0009.00028>



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- The population of census tract 403317 is similar to R/ECAP census tract 402304 both of which are smaller than R/ECAP census tract 402702 by about 2,000 people.
- All of the R/ECAP census tracts have minority populations constituting about 95 percent of the tracts' populations, whereas the minority population of census tract only makes up about 80 percent of the tract's total population.
- The number of owner-occupied housing units in census tract 403317 was significantly greater by about 1,000 units than the number of owner-occupied units in the R/ECAP census tracts.
- Similarly, the number of 1- to 4- family units in census tract 403317 was significantly greater than the number of 1- to 4- family units in the R/ECAP census tract.

Table D-4: Non-R/ECAP Demographics - Census Tract 4033.17

Census Tract ID	Median Family Income %	2020 Median Family Income	Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4- Family Units
4033.17	150.34	\$77,300	\$116,213	4,514	79.82	3,603	1,270	1,496

Source: Federal Financial Institutions Examination Council, 2020 FFIEC Census Report – Summary Census Demographic Information.

Redlining practices in Pomona may have led to communities of color to rental housing as the only viable option for housing, and away from home ownership opportunities. These rental opportunities may be in areas that were not necessarily part of the original spatial pattern of the City, but in areas that were eventually incorporated and pieced together from disparate County tracts. This could have exacerbated the ability for the neighborhoods to have coordinated, targeted investments in infrastructure (road, sewer, water) improvements and other amenities to improve quality of life. Conversely, as is consistent with R/ECAP analysis, these neighborhoods also may have represented a concentration of cultural relevance to various communities of color and provided an opportunity for these communities to increase their social capital.

The City is committed to increasing housing mobility opportunities for persons outside of the City or in the Los Angeles County as a whole. **Section 5: The Plan for Pro Housing Pomona** of this Housing Element outlines housing opportunity, affordable housing, and fair housing strategies to increase opportunities to all households. The City has included the following programs to support fair and affordable housing throughout the City:

- **Program 2.6C: Fair Housing Assistance Program**
- **Program 5.1A: Fair Housing in Land Use Regulations**
- **Program 5.1B: Fair Housing in Government and Non-Government Financing**
- **Program 5.1C: Fair Housing in Economic Opportunity**
- **Program 1.4B: Affordable Housing Incentives**
- **Program 1.4C: Development of Housing for Extremely Low and Lower Income Housing**
- **Program 2.4B: Reuse, Repurpose, and Redevelopment of Public Assembly Sites**
- **Program 2.5B: Affordable Housing Trust Funds & Targeted Investments**

The City has identified multiple infill for mixed income housing sites as part of the Sites Analysis, which are located within two of the R/ECAP areas in the central portion of Pomona identified in **Figure D-3**. Mixed



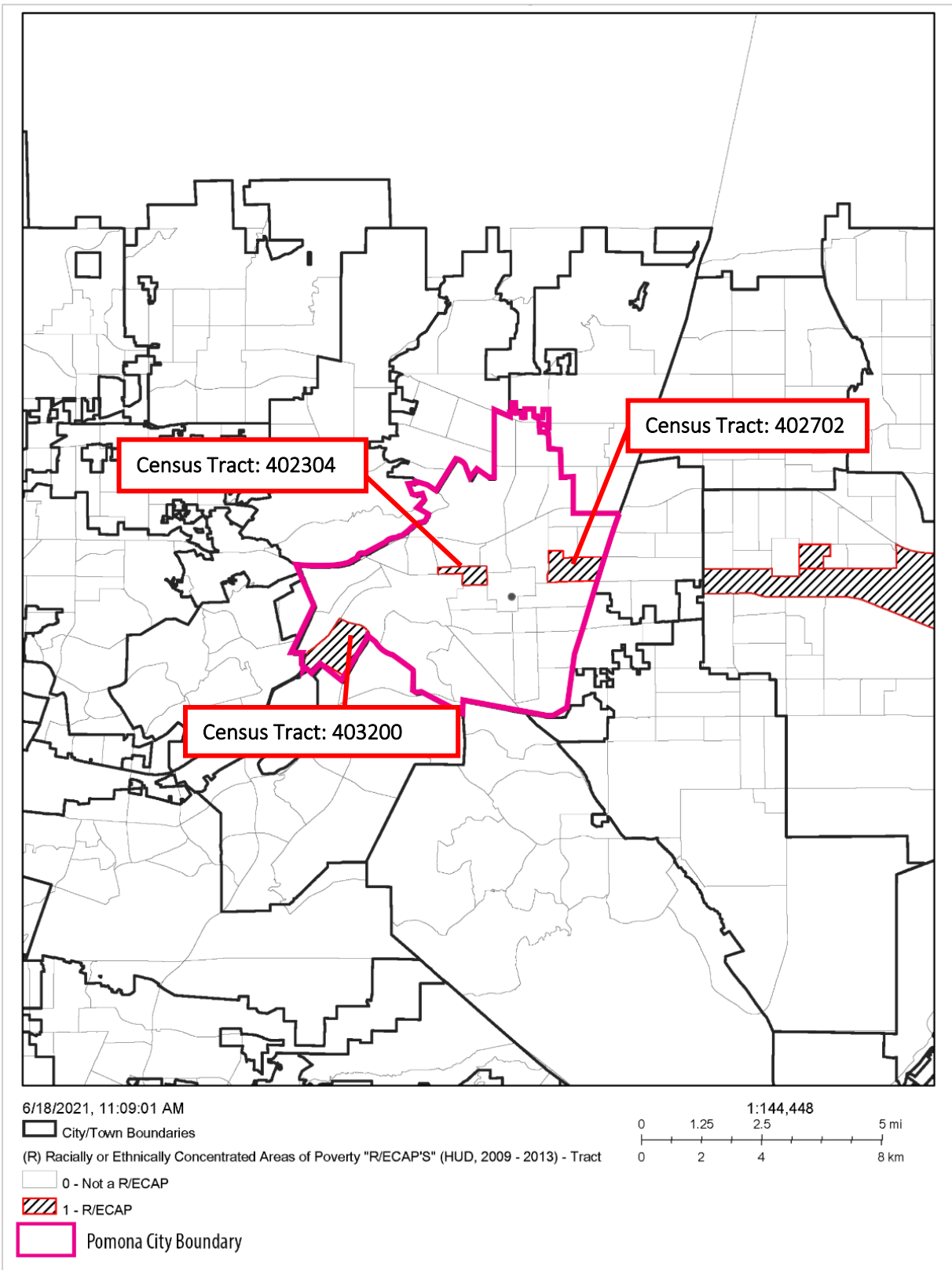
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income housing in this area may decrease cost burdens and create opportunities near commercial amenities and employment centers.



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Figure D-3: R/ECAP Areas in Pomona



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, Data Versions: AFFHT0006.



Racially Concentrated Areas of Affluence (RCAs)

Racially or Ethnically Concentrated Areas of Poverty have long been analyzed and reviewed as a contributing factor to segregation. However, patterns of segregation in the United States show that of all racial groups, the White population is the most severely insulated (separated from other racial groups).⁷ Research also identifies segregation of affluence to be greater than the segregation of poverty. Racial and economic segregation can have significant effects on respective communities, including but not limited to, socioeconomic disparities, educational experiences and benefits, exposure to environmental conditions and crime, and access to public goods and services.

Data used in the analysis of Racially Concentrated Areas of Affluence (RCAA) is from the 2012-2016 American Community Survey and measured at the census tract level. The definition for an RCAA is a census tract in which 80 percent or more of the population is White and has a median income of at least \$125,000. The nationwide RCAA analysis identifies the following:

- RCAA tracts have more than twice the median household income of the average tract in their metro area.
- Poverty rates in RCAAs are significantly lower and are, on average about 20 percent of a typical tract.
- RCAAs tracts are more income homogenous than R/ECAPs.
- The average RCAA is about 57 percent affluent, whereas the average R/ECAP had a poverty rate of 48 percent.
- The typical RCAA tract has a rate of affluence 3.2 times that of a typical tract, whereas R/ECAPs on average had a poverty rate 3.2 times that of a typical tract.

Overall, RCAAs may represent a public policy issue to the extent that they have been created and maintained through exclusionary and discriminatory land use and development practices. Postwar patterns of suburbanization in many metropolitan areas were characterized by White communities erecting barriers to affordable housing and engaging in racially exclusionary practices.

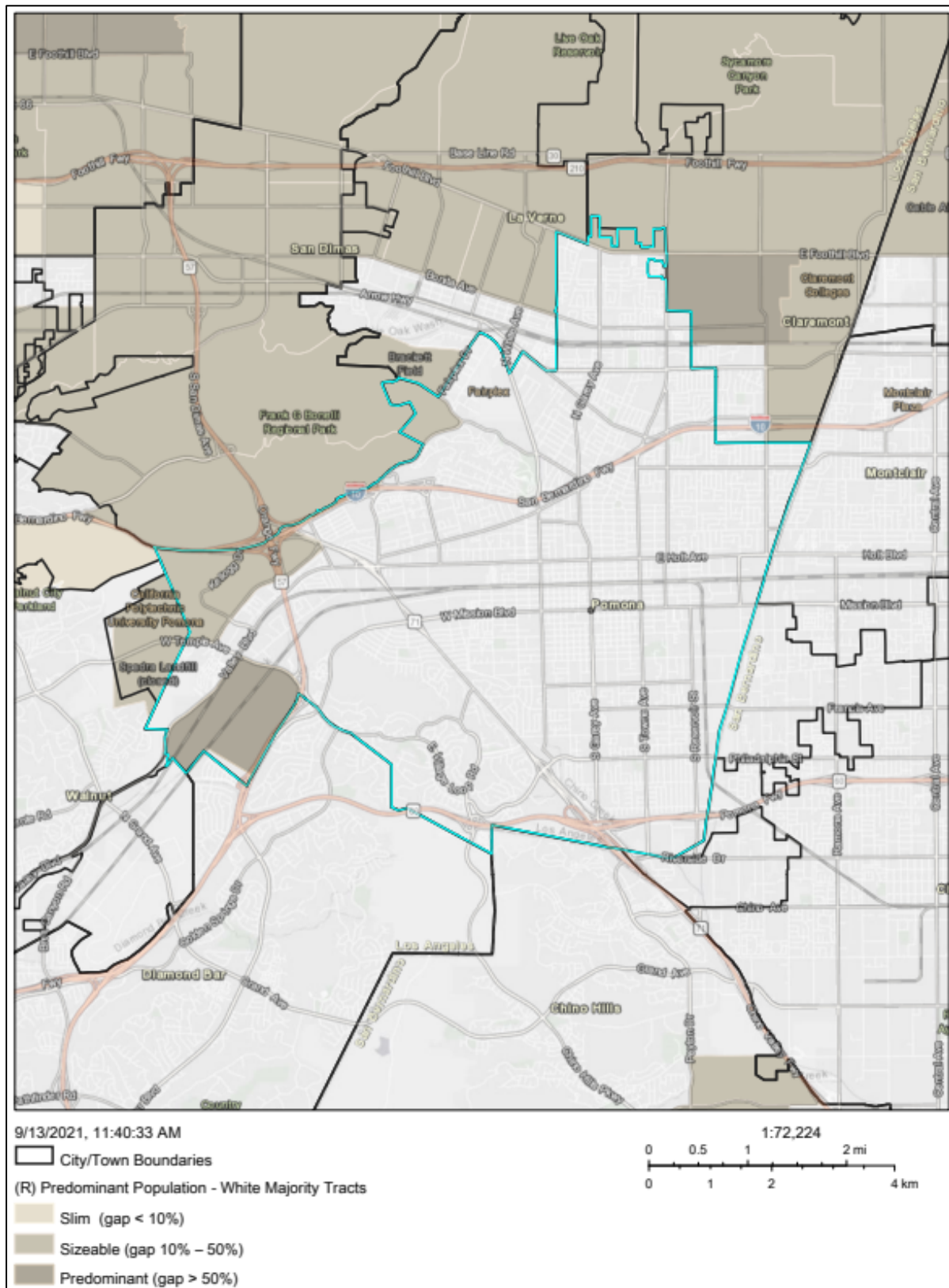
The City of Pomona has one census tract, located in the south-western region, which is made up of a predominantly White population, as illustrated in **Figure D-4**. Despite a few minor areas with large percentages of White population, the rest of the City is made up of a fairly diverse population. A concentrated area of affluence is identified when areas have both a majority White population and a median income over \$125,000. **Figure D-5** shows only one small census tract in the southern region of Pomona reports a median income greater than \$125,000; however, it does not overlap with a predominantly White population. Therefore, there are no identified concentrated areas of affluence within Pomona. **Table D-5** shows local (Pomona) and regional (Los Angeles County) context for the median household incomes of White residents.

⁷ Racially Concentrated Areas of Affluence: A Preliminary Investigation. University of Minnesota. Edwards Goets, Damiano, Williams. 2019.



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Figure D-4: RCAA – Majority White Tracts, Pomona

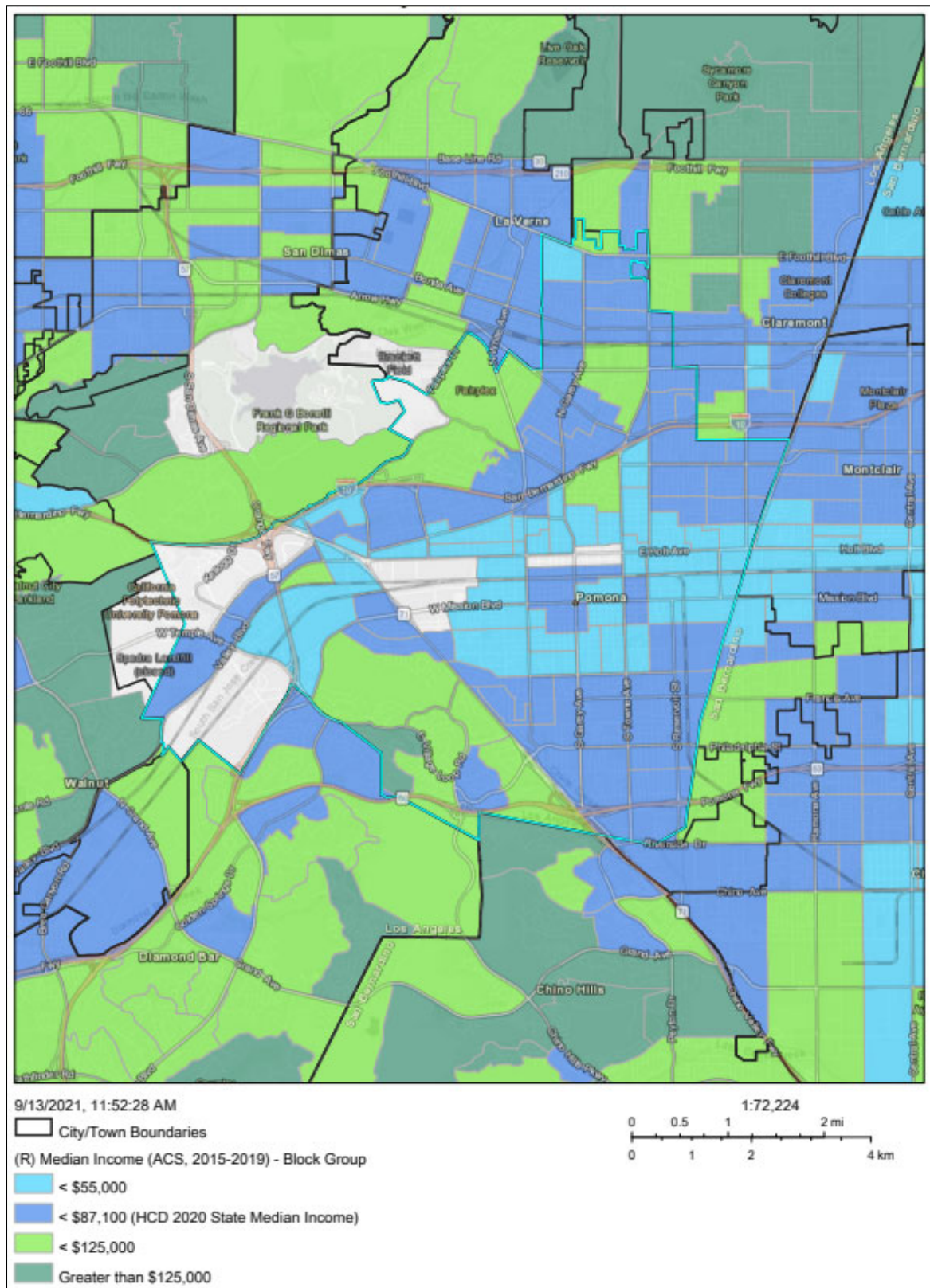


Source: California Department of Housing and Community Development – AFFH Data Viewer



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Figure D-5: RCAA – Median Income, Pomona



Source: California Department of Housing and Community Development – AFFH Data Viewer



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Table D-5: RCAAs - Median Household Income by Race, Pomona and Los Angeles County

Race	Pomona		Los Angeles County	
	Median Income	Population	Median Income	Population
White	\$62,360 ¹	47.5%	\$75,422 ¹	51.3%
All Households	\$60,598	--	\$68,044	--

Notes: 1. Median income in the past 12 months (in 2019 inflation-adjusted dollars)
Source: American Community Survey, 5-Year Estimates, 2019.

Disparities in Access to Opportunity

Regional Opportunity Index (ROI)

The UC Davis Center for Regional Change and Rabobank partnered to develop the Regional Opportunity Index (ROI) intended to help communities understand local social and economic opportunities. The goal of the ROI is to help target resources and policies toward people and places with the greatest need to foster thriving communities. The ROI incorporates both “people” and “place” components, integrating economic, infrastructure, environmental, and social indicators into a comprehensive assessment of the factors driving opportunity.”

The **ROI: People** is a relative measure of people's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life as follows:

- **Education Opportunity:** Assesses people’s relative success in gaining educational assets, in the form of a higher education, elementary school achievement, and regular elementary school attendance.
- **Economic Opportunity:** Measures the relative economic well-being of the people in a community, in the form of employment and income level.
- **Housing Opportunity:** Measures the relative residential stability of a community, in the form of homeownership and housing costs.
- **Mobility/Transportation Opportunity:** Contains indicators that assess a community’s relative opportunities for overcoming rural isolation.
- **Health/Environment Opportunity:** Measures the relative health outcomes of the people within a community, in the form of infant and teen health and general health.
- **Civic Life Opportunity:** A relative social and political engagement of an area, in the form of households that speak English and voter turnout.

The **ROI: Place** is a relative measure of an area's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life.

- **Education Opportunity:** Assesses a census tract's relative ability to provide educational opportunity, in the form of high-quality schools that meet the basic educational and social needs of the population.
- **Economic Opportunity:** Measures the relative economic climate of a community, in the form of access to employment and business climate.
- **Housing Opportunity:** Measures relative availability of housing in a community, in the form of housing sufficiency and housing affordability.
- **Health/Environment Opportunity:** A relative measure of how well communities meet the health needs of their constituents, in the form of access to health care and other health-related environments.



- **Civic Life Opportunity:** Measures the relative social and political stability of an area, in the form of neighborhood stability (living in same residence for one year) and US citizenship.

Figure D-7 identifies the achievement levels that persons living within the City have and **Figure D-8** displays the opportunity that different census tracts can provide. As shown in **Figures D-7** and **D-8** below, the majority of the City of Pomona is classified as a low opportunity zone with pockets of high opportunity in the southern portion of the City. This indicates a low level of relative opportunities that people are able to achieve as well as a low level of relative opportunities that Pomona provides. **Table D-6** below identifies the City's overall opportunity indicators compared to the State. The data shows the following key findings:

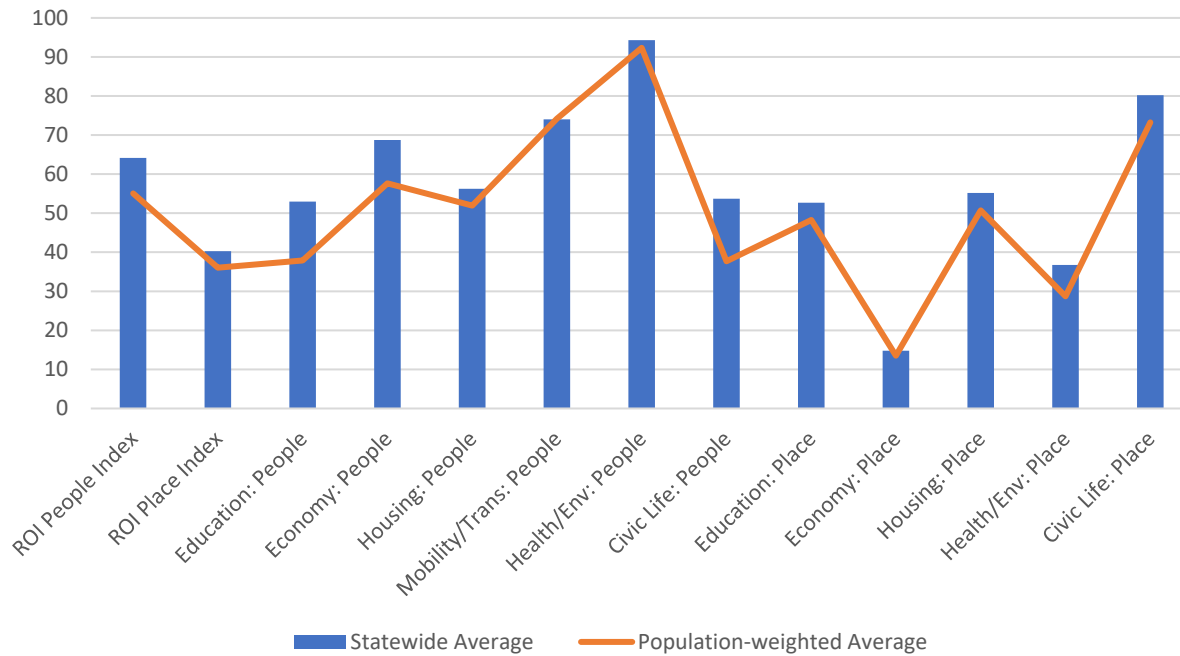
- The City has higher rates of college educated adults but overall lower levels of UC and CSU eligibility. The High rates of college educated adults may be reflective of the Cal Poly Pomona students that live in Pomona.
- Pomona residents experience lower basic income levels, and the City has a slightly lower job availability rate than the State. Overall City and State job quality, growth and bank accessibility are similar.
- Pomona has a slightly lower rate of homeownership than the State, but residents also experience lower rates of cost burden. There are lower rates of adequate housing in the City compared to the State, but similar opportunities for affordable housing.
- Mobility and transportation access is moderate in both Pomona and the State; Pomona residents have slightly lower commute times than the State's median.
- Overall health and environmental opportunities are comparable to the State. However, Pomona has poor air quality and low health care and supermarket availability.
- Pomona has lower rates of US citizenship and English speakers, as well as significantly lower percentage of voters compared to the State.

As Pomona is considered a low opportunity region, the City is committed to implementing policies and programs to encourage new opportunities and access to existing and future residents. **Section 5: The Plan for Pro Housing Pomona** identifies the strategies the City will explore in order to provide opportunity and housing for persons within the Pomona/Los Angeles County region.



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Figure D-6: Regional Opportunity Index Pomona and California



Source: UC Davis Center for Regional Change and Rabobank, 2014.

Table D-6: Local and State Regional Opportunity Indicators for Place and People

ROI Indicator		Pomona	California
Education	People		
	College Educated Adults	22%	38%
	Math Proficiency	56%	70%
	English Proficiency	52%	65%
	Elementary Truancy	23%	24%
	Place		
	High School Graduation Rate	80%	83%
	UC/CSU Eligibility	28%	41%
	Teacher Experience	39%	36%
	High School Discipline Rate	12%	6%
Economic	People		
	Employment Rate	88%	89%
	Minimum Basic Income	48%	64%
	Place		
	Job Availability	604.78	701.75
	Job Quality	36%	40%
	Job Growth	2%	3%
Housing	Bank Accessibility	0.20	0.24
	People		
	Home Ownership	52%	55%
	Housing Cost Burden	45%	52%
	Place		
	Housing Adequacy	79%	91%



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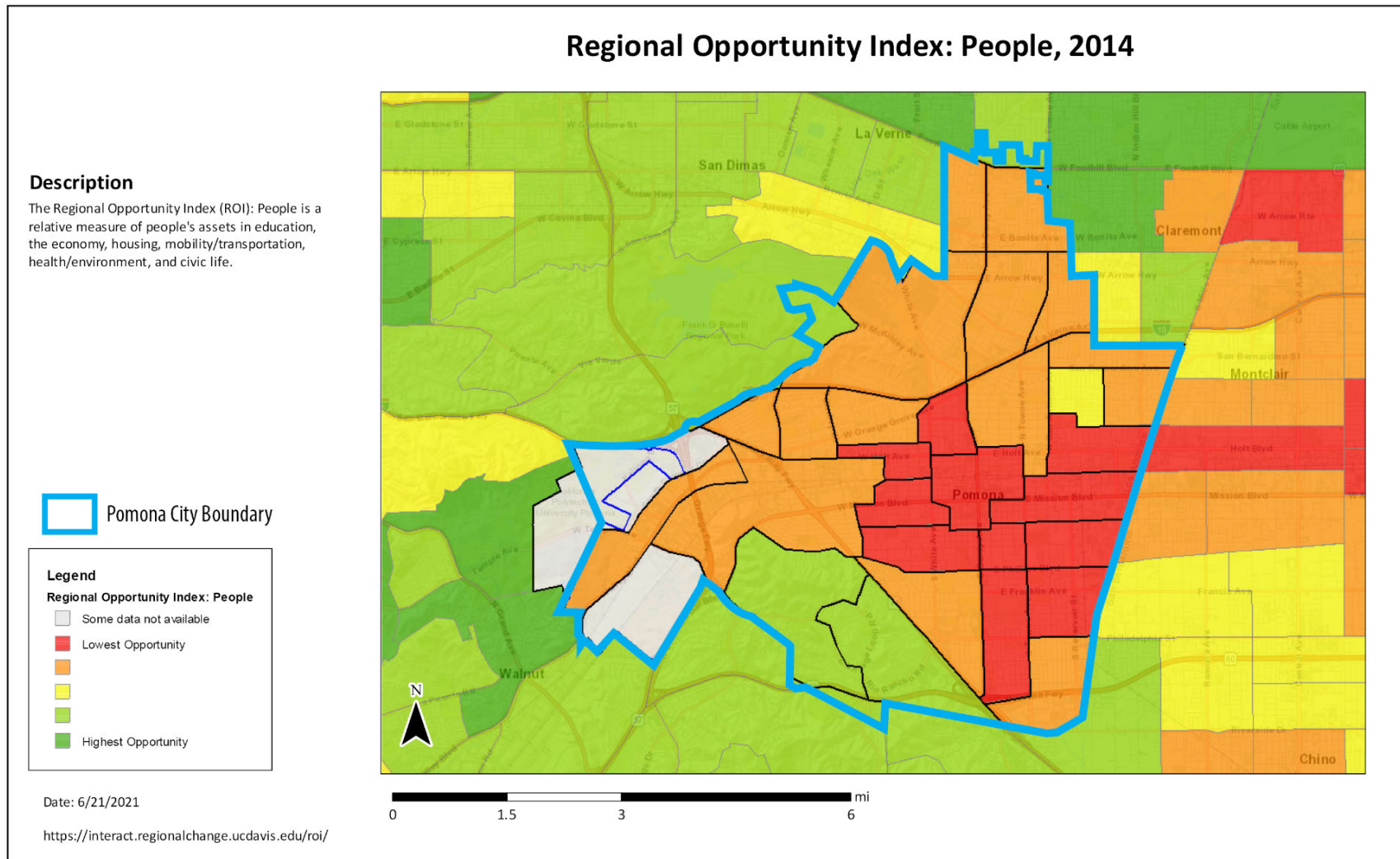
Table D-6: Local and State Regional Opportunity Indicators for Place and People			
ROI Indicator		Pomona	California
	Housing Affordability	0.19	0.19
Mobility	People		
	Vehicle Availability	85%	86%
	Commute Time	57%	60%
	Internet Access	4.59	4
Health and Environment	People		
	Infant Health	95%	95%
	Birth to Teens	11%	7%
	Years of Life Lost	34.78	29.84
	Place		
	Air Quality	13.58	10.01
	Prenatal Care	85%	83%
	Access to Supermarket	43%	53%
	Health Care Availability	1.43	1.76
Civic Life	People		
	Voting Rates	17%	31%
	English Speakers	80%	88%
	Place		
	US Citizenship	73%	83%
	Neighborhood Stability	84%	85%

Source: UC Davis Center for Regional Change and Rabobank, 2014.



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Figure D-7: Regional Opportunity Index, People – City of Pomona

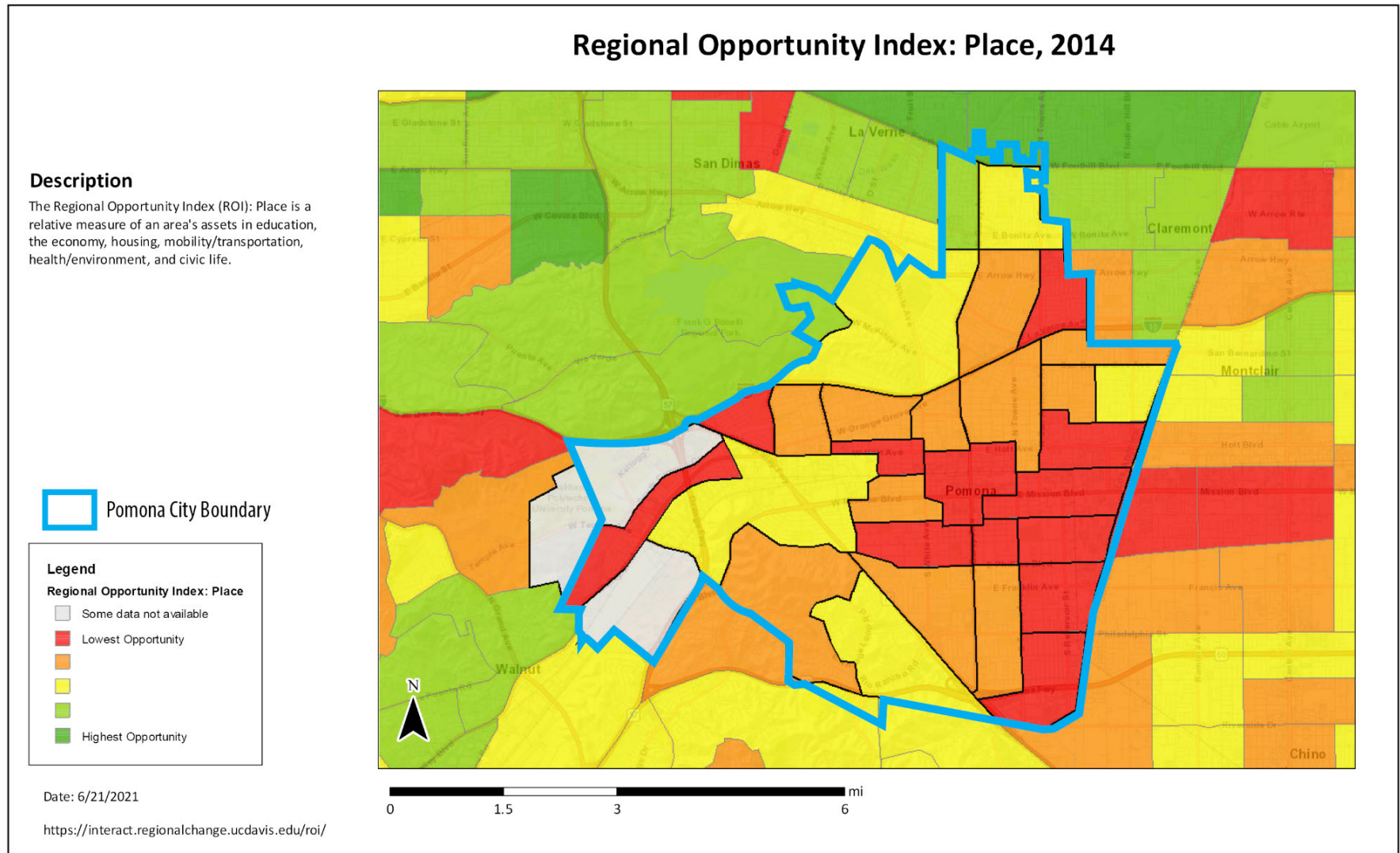


Source: UC Davis Center for Regional Change and Rabobank, 2014.



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Figure D-8: Regional Opportunity Index, Place – City of Pomona



Source: UC Davis Center for Regional Change and Rabobank, 2014.



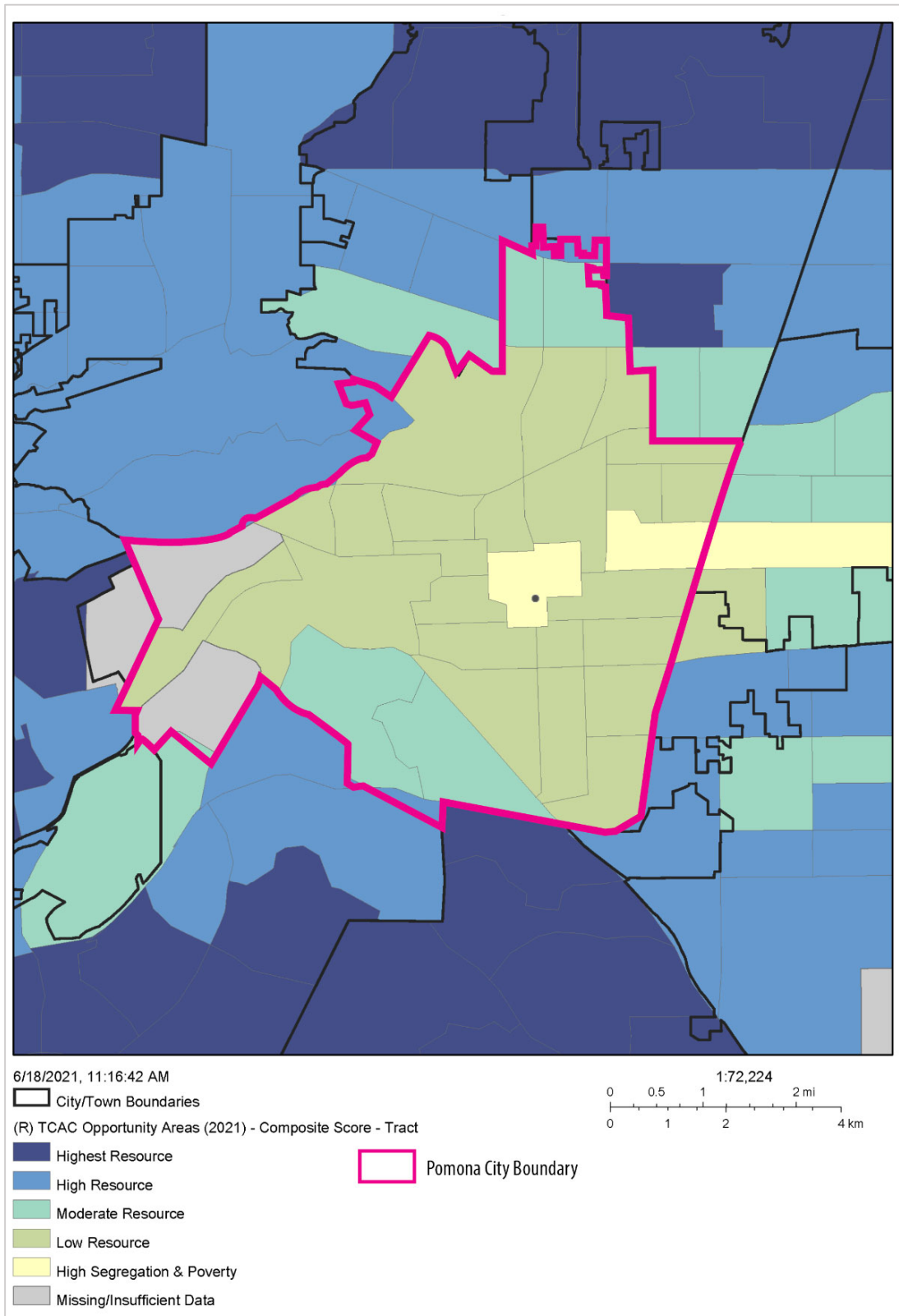
Tax Credit Allocation Committee (TCAC) Opportunity Area Maps

Additionally, the Department of Housing and Community Development (HCD) together with the California Tax Credit Allocation Committee (TCAC) established the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related State agencies/departments to further the fair housing goals (as defined by HCD). The Task force developed the TCAC/HCD opportunity Area Maps to understand how public and private resources are spatially distributed. The Task force defines opportunities as pathways to better lives, including health, education, and employment. Overall, opportunity maps are intended to display which areas, according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.

According to the Task Force’s methodology, the tool allocates the 20 percent of the tracts in each region with the highest relative index scores to the “Highest Resource” designation and the next 20 percent to the “High Resource” designation. Each region then ends up with 40 percent of its total tracts as “Highest” or “High” resource. These two categories are intended to help State decision-makers identify tracts within each region that the research suggests low-income families are most likely to thrive, and where they typically do not have the option to live—but might, if given the choice. As shown in **Figure D-9** below, nearly all of Pomona is classified as low to moderate resource areas with pockets of high segregation in the center of the City. The City of Pomona is committed to exploring programs and avenues to increase housing access and opportunity to both existing residents, future residents, and households in nearby areas.



Figure D-9: TCAC Opportunity Index Map, Pomona



Source: California Tax Credit Allocation Committee and Department of Housing and Community Development, 2021.



Opportunity Indicators by Race/Ethnicity

For many households, access to neighborhoods with higher levels of opportunity can be more difficult due to discrimination and when there may not be a sufficient range and supply of housing in such neighborhoods. In addition, the continuing legacy of discrimination and segregation can impact the availability of quality infrastructure, educational resources, environmental protections, and economic drivers, all of which can create disparities in access to opportunity.

HUD developed the opportunity indicators to help inform communities about disparities in access to opportunity, the scores are based on nationally available data sources and assess resident's access to key opportunity assets in the City. **Table D-7** provides the index scores (ranging from zero to 100) for the following opportunity indicator indices:

- **Low Poverty Index:** The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. The higher the score, the less exposure to poverty in a neighborhood, the maximum score being 100. For example, a low poverty index score of 100 means no exposure to poverty.
- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on State exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the score, the higher the school system quality is in a neighborhood, the maximum score being 100. For example, a school proficiency index score of 100 means immediate access to schools with the highest testing performance.
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood, the maximum score being 100. For example, a labor market engagement index score of 100 means the maximum eligible population is employed and a part of the labor market in the community.
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a three-person single-parent family with income at 50% of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA). The higher the transit trips index, the more likely residents in that neighborhood utilize public transit. The maximum score being 100; for example, a transit trips index score of 100 means immediate access to schools with the highest testing performance.
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a three-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins



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harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.

Table D-7 below displays the opportunity indices by race and ethnicity for persons in Pomona. Key findings from the opportunity indicators (shown below) include:

- According to the data, there is moderate exposure to poverty among the population of Pomona, with the Hispanic population experiencing the most exposure to poverty at 29.55.
- Additionally, the access to quality education system is low to moderate among all racial/ethnic groups (each group has an opportunity index score above 35 but not surpassing 45).
- The City offers moderate labor and economic opportunity and there is high access to transportation.
- Additionally, transportation is considered affordable among all race and ethnic groups in the City (all scoring above 60).
- Across all race and ethnic groups there were very low environmental health index scores, meaning there is high exposure to harmful pollutants in the City. Each group has a score below 25, indicating poor environmental quality across the City.
- Persons of all race and ethnic groups who have an income below the federal poverty line experience each lower opportunity, higher exposure to income and education barriers and higher exposure to harmful pollutants, as well and lower access to affordable transportation.

Table D-7: Opportunity Indicators by Race and Ethnicity in Pomona							
Pomona	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	44.25	43.66	33.78	76.89	66.05	37.15	20.20
Black, Non-Hispanic	38.47	40.23	28.11	77.03	65.43	35.50	20.01
Hispanic	29.55	35.61	22.18	77.55	67.74	31.83	19.64
Asian or Pacific Islander, Non-Hispanic	45.36	40.91	32.52	76.26	64.56	32.09	19.66
Native American, Non-Hispanic	30.95	37.15	24.63	78.20	69.31	31.34	19.72
Population below federal poverty line							
White, Non-Hispanic	36.72	40.93	27.77	77.46	70.33	37.39	20.59
Black, Non-Hispanic	32.66	36.22	24.65	76.15	67.76	35.81	20.08
Hispanic	23.23	35.39	19.27	78.52	70.72	30.00	19.87
Asian or Pacific Islander, Non-Hispanic	34.13	34.90	25.75	79.22	69.98	27.40	20.12
Native American, Non-Hispanic	57.64	53.81	20.76	82.56	67.92	47.54	19.28
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).							



Opportunity Indicators – Education

The TCAC/HCD Opportunity Area Maps include education data, as illustrated in **Figure D-10**. This data represents opportunity levels based on the following four factors:

- **Math proficiency** – Percentage of 4th graders who meet or exceed math proficiency standards.
- **Reading proficiency** – Percentage of 4th graders who meet or exceed literacy standards.
- **High school graduation rates** – Percentage of high school cohort that graduated on time.
- **Student poverty rate** – Percentage of students not receiving free or reduced-price lunch.

As **Figure D-10** shows, the City is categorized as low to moderate opportunity levels for education. The City of Pomona is surrounded by a variety of educational opportunity levels, but most have higher educational opportunity levels. Montclair and an unincorporated area to the east of the City represents the most similar education outcomes, while the other Cities bordering Pomona are shown to have very positive education outcomes. The region directly surrounding the City of Pomona is categorized as having moderate to high education outcomes which is higher than Pomona.

As part of the City's candidate sites analysis (**Appendix C**), sites have been identified equally throughout the City as a whole; there are no concentrations of lower income units identified. As such, the future development of affordable housing may occur in regions of the City providing various levels of opportunity for education. To provide improved opportunities for existing and future residents, the City has included **Program 5.1C: Fair Housing in Economic Opportunity** in **Section 5: The Plan for Pro Housing Pomona**.

Opportunity Indicators – Economy

The TCAC/HCD Opportunity Area Maps include economic data, as illustrated in **Figure D-11**. This data represents opportunity levels based on the following five factors:

- **Poverty** – Percent of population with income above 200% of federal poverty line.
- **Adult Education** – Percent of adults with a bachelor's degree or above.
- **Employment** – Percent of adults aged 20-64 who are employed in the civilian labor force or in the armed forces.
- **Job Proximity** – Number of jobs filled by workers with less than a BA that fall within a given radius (determined by the typical commute distance of low-wage workers in each region) of each census tract population-weighted centroid.
- **Median Home Value** - Value of owner-occupied units.

As shown in **Figure D-11** the City is made up of a majority low economic outcome scores. This trend is dissimilar to that of the region surrounding the City of Pomona. Every City that borders Pomona has higher economic outcomes and do not have the lowest economic outcome category that is most common in Pomona. The scores show that increased economic opportunities exist in the Cities bordering Pomona and may influence Pomona residents to find opportunities outside of the City.

As part of the City's candidate sites analysis (**Appendix C**), sites have been identified equally throughout the City as a whole; there are no concentrations of lower income units identified. As such, the future



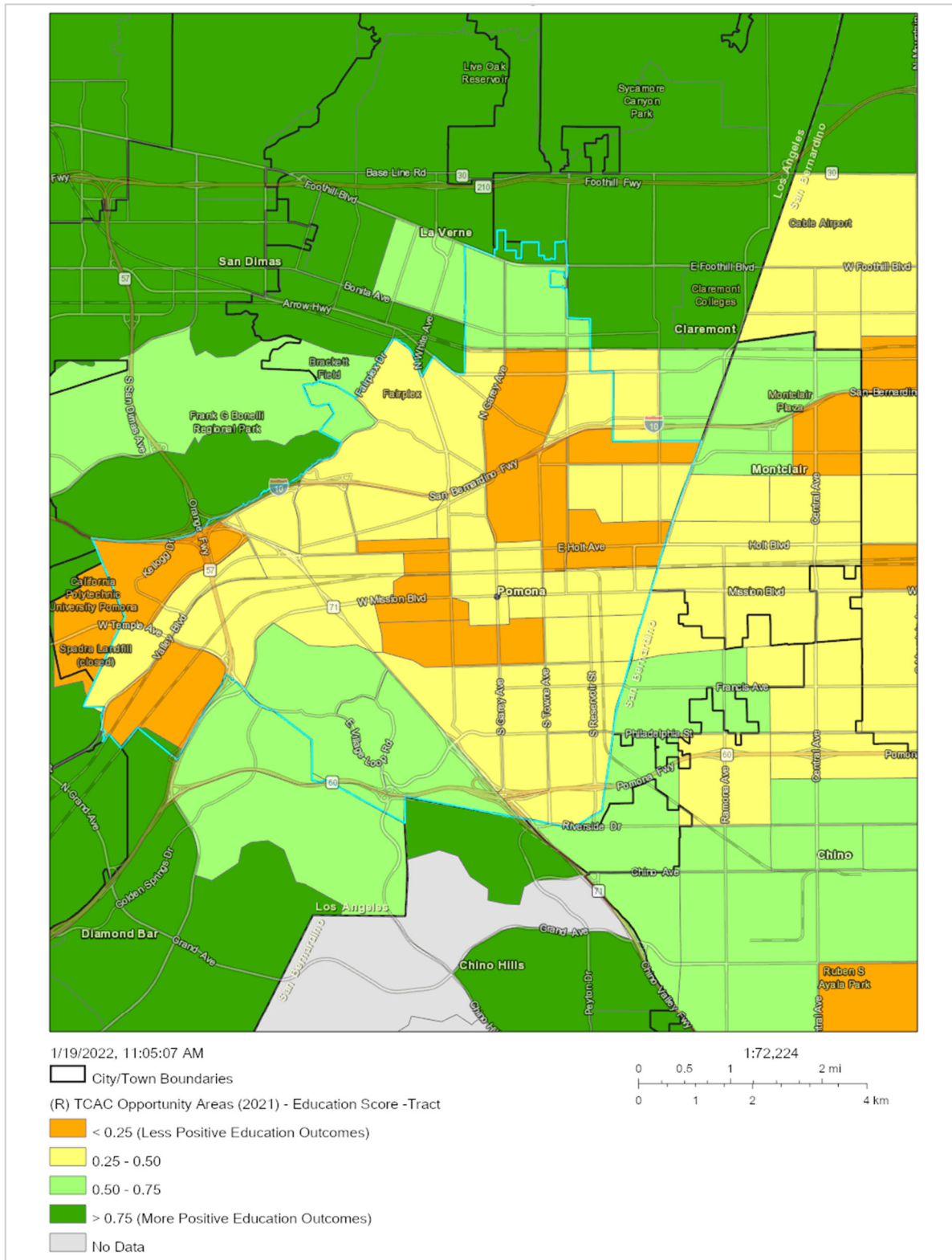
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development of affordable housing may occur in regions of the City providing various levels of opportunity for economic achievement. To provide improved opportunities for existing and future residents, the City has included **Program 5.1C: Fair Housing in Economic Opportunity** in **Section 5: The Plan for Pro Housing Pomona**.



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Figure D-10: TCAC/HCD Opportunity Map – Education Score

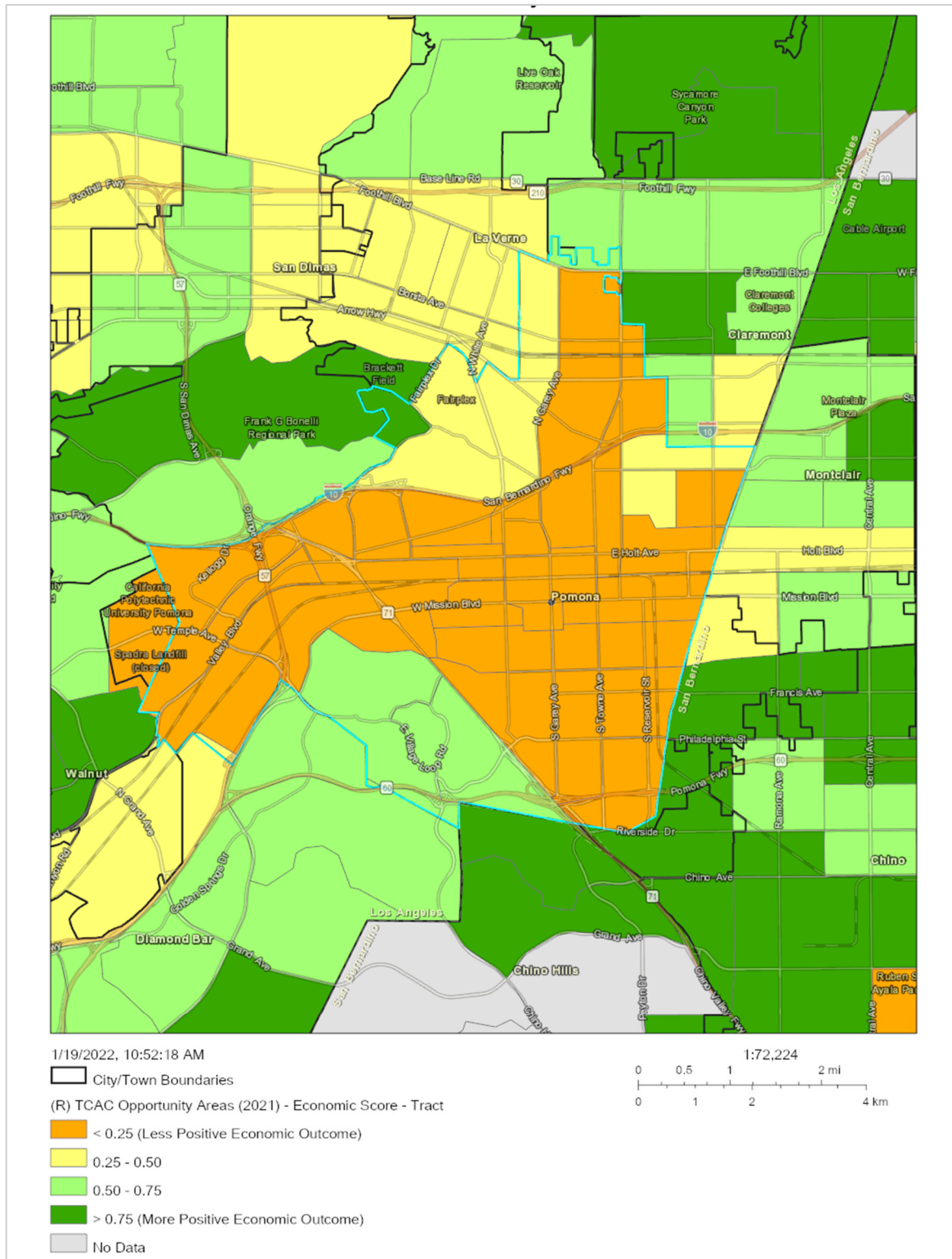


Source: California Department of Housing and Community Development – AFFH Data Viewer



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Figure D-11: TCAC/HCD Opportunity Map – Economic Score



Source: California Department of Housing and Community Development – AFFH Data Viewer



Access to Transit

Access to transportation, specifically public transit provides households with affordable and environmentally friendly commuting options. It can also increase accessibility to essential retail such as grocers and markets as well as recreational activities and safe transit options for young adults and children.

AllTransit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the data illustrated in **Figure D-12**, Pomona scored a 6.0 AllTransit performance score, illustrating moderate combination of trips per week and number of jobs accessible that enable a moderate number of people to take transit to work. Additionally, AllTransit identified the following transit related statistics for Pomona:

- 96.2 percent of all jobs in Pomona are located within ½ mile of transit
- There are 48,717 customer households within a 30-minute transit commute of local businesses
- 2.21 percent of workers in Pomona walk to work
- 0.86 percent of workers in Pomona bike to work

On average, households in Pomona have the following:

- 1,316 transit trips per week within ½ mile
- 5 transit routes within ½ mile
- 77,858 jobs accessible in a 30-minute transit trip
- 2.67 percent of all commuters use transit

By comparison, the City of Chino scored 4.7, the City of Claremont scored 5.6, the City of Diamond Bar scored 3.8 and the City of Ontario scored 5.0. Access to transportation increases both economic and environmental/health opportunities. In an effort to increase both mobility and economic access, the City of Pomona has identified the Corridor Specific Plan area as a primary source of land to accommodate low and very low units due to its accessibility, resources and proximity to goods and services. As the map below shows, these areas score well with connectivity compared to the majority of the other areas of the City.



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Figure D-12: AllTransit Performance Score – City of Pomona



Source: AllTransit Map Tool, July 2019 Update



Environmental Justice

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviro Screen). In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviro Screen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Research has shown a heightened vulnerability of people of certain ethnicities and lower socioeconomic status to environmental pollutants.

The CalEnviro Model Is made up of a suite of 20 statewide indicators of pollution burden and population characteristics associated with increased vulnerability to pollution's health effects. The model uses the follow analysis and calculation to identify areas of health risk:

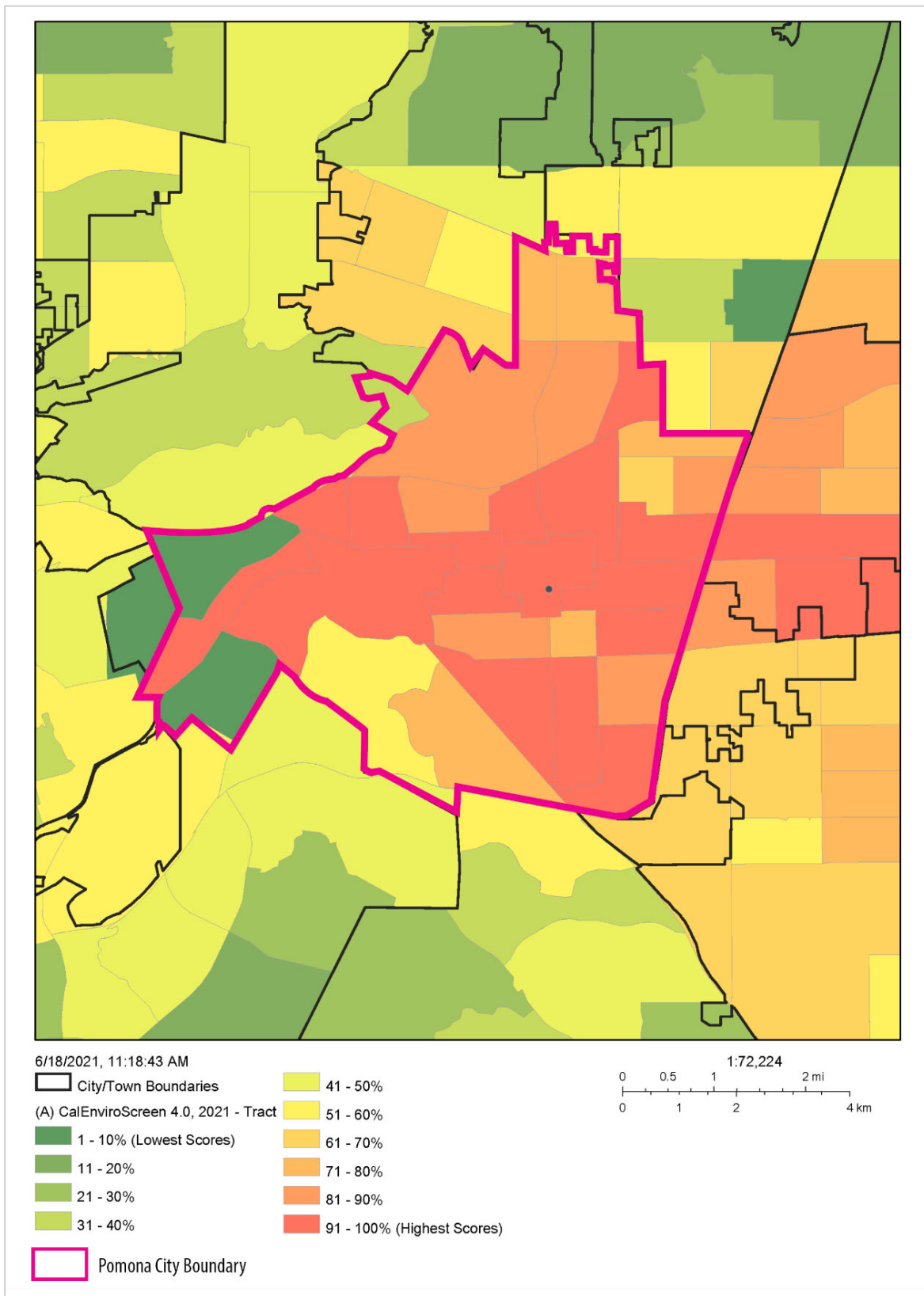
- Uses a weighted scoring system to derive average pollution burden and population characteristics scores for each census tract.
- Calculates a final CalEnviroScreen score for a given census tract relative to the other tracts in the state by multiplying the pollution burden and population characteristics components together.
- The score measures the relative pollution burdens and vulnerabilities in one census tract compared to others and is not a measure of health risk.

Figure D-13 below displays mapped results for the CalEnviro Screen in Pomona. The map shows that all of Pomona is primarily high scoring. Overall, high scoring signifies high pollution burdens in the City, therefore, the City of Pomona shows high exposure to harmful pollutants, specifically for residents in low-income census tracts. Low-income residents or areas with higher percentages of low-income households are often disproportionately affected by poor environmental quality. **Appendix B** identified the sites to accommodate the RHNA allocation, while a number of the sites are within the central Corridor Specific Plan, providing housing options near essential resources and economic opportunity/jobs can decrease overall vehicle miles travelled (VMT), which in many cases is related to air quality. Additionally, the City may work with developers to implement and increase the use of environmentally friendly materials and strategies.



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Figure D-13: CalEnviro Screen Score, Pomona



Source: CalEnviro Screen 3.0 Map Tool, June 2018 Update



4. *Assessment of Disproportionate Housing Needs*

The analysis of disproportionate housing needs within Pomona evaluated existing housing need, need of the future housing population, and units within the community at-risk of converting to market-rate.

Existing Needs

In 2021, the City was allocated and provided 905 Section 8 Housing Choice vouchers. The City has been allocated 905 vouchers each year since 2017. In addition, the City of Pomona has been allocated the following vouchers for rental assistance in the community:

- 30 HUD Veterans Affairs Supportive Housing (HUD-VASH) vouchers for homeless veterans in 2017;
- 60 HUD-VASH vouchers for homeless veterans annually since 2018;
- 34 total mainstream rental assistance vouchers for non-elderly disabled and homeless families for 2018 and 2019;
- 126 total mainstream rental assistance vouchers for non-elderly disabled and homeless families for 2020 and 2021;
- 4 Foster Youth Initiated Tenant Protection vouchers for transitional aged youth between 18 and 24 years of age in 2021; and
- 78 Emergency Housing vouchers for individuals experiencing homelessness, at-risk of homelessness, victims of domestic violence, and households at-risk of housing instability in 2021.

Housing Needs in Pomona

A variety of factors affect housing needs for different households. Most commonly, disability, household income and households' characteristics shape the type and size of housing units needed, as well as accessibility based on existing units in a City. **Tables D-6** through **D-14** displayed data for demographic characteristics of Pomona, as compared to the County of Los Angeles and the State of California. Additional detailed analysis of the Pomona community demographics is outline in **Appendix A.1: Housing Needs Assessment** of this Housing Element.

Homelessness

People experiencing homelessness are those who do not have a fixed, regular, and adequate overnight residence, or whose overnight residence is a shelter, street, vehicle, or enclosure or structure unfit for habitation. Factors contributing to increases of homelessness may include the following:

- Lack available resources to support stable housing access
- Spikes in rent increase and lack of tenant protections
- Housing discrimination
- Evictions
- Lack of housing affordable to low- and moderate-income persons
- Increases in the number of persons whose incomes fall below the poverty level
- Reductions in public subsidies to the poor
- The deinstitutionalization of the mentally ill



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According to the Los Angeles Homeless Service Authority, Homeless Point-in-Time Count, in 2018 there were an estimate 775 unhoused persons in Pomona, in 2019 this decreased to an estimated 696 persons and an estimated 772 persons in 2020. Due to the COVID-19 pandemic, 2021 counts were not initiated for Los Angeles County. Overall, the 772 unhouse persons in Pomona in 2020 account for about 1.4 percent of the overall Los Angeles County count of 54,291 persons. When contextualized with the total number of people residing in Pomona, the 772 homeless individuals represent approximately 0.51% of the population. In neighboring jurisdictions, the point in time count of homeless persons in 2020 was:

- Covina: 4 persons
- Chino: 23 persons*
- Chino Hills: 4 persons
- Ontario: 128 Persons*

The racial and ethnic demographic data for unhoused persons is not broken down by jurisdictions, however for the 772 unhoused persons in the Pomona 402 were unsheltered and 320 were sheltered. Of the unsheltered population, 48.6 percent lived on the street, 11.4 percent lived in cars, 10.9 percent lived in vans, 23.8 percent lived in RVs/campers, 1.6 percent lived in a makeshift shelter and 4.17 percent lived in tents. Of those who were sheltered, 85 percent lived in emergency shelters and 15 percent lived in transitional housing.

Disability

Table D-8 displays the data for persons with disabilities in the City, County, and State. Overall, about 10 percent of the California population reported having at least one disability. Similarly, in the City 11 percent of persons reported at least one disability. According to the data, compared to the County and State, Pomona has the highest percentage of a population with a disability. Persons who report having ambulatory difficulty and independent living difficulty make up the highest percentages of persons with disabilities in the City (6.2percent and 5.4 percent respectively). Ease of reasonable accommodation procedures and opportunity for accessible housing can provide increased housing security for the population with disabilities.

Table D-8: Population by Disability Type, Compared by Geography, 2019			
Disability	City of Pomona	County of Los Angeles	California
Total with a Disability	11.0%	9.9%	10.6%
Hearing Difficulty	2.6%	2.5%	2.9%
Vision Difficulty	2.5%	2.0%	2%
Cognitive Difficulty	4.6%	4.1%	4.3%
Ambulatory Difficulty	6.2%	5.7%	5.8%
Self-care Difficulty	2.6%	2.9%	2.6%
Independent Living	5.4%	5.4%	5.5%
Source: American Community Survey, 5-Year Estimates, 2019.			

Figure D-14 displays 2010-2014 ACS data for persons with disabilities and **Figure D-15** displays 2015-2019 data for persons with disabilities. Compared, the maps show overall increases in the population of persons



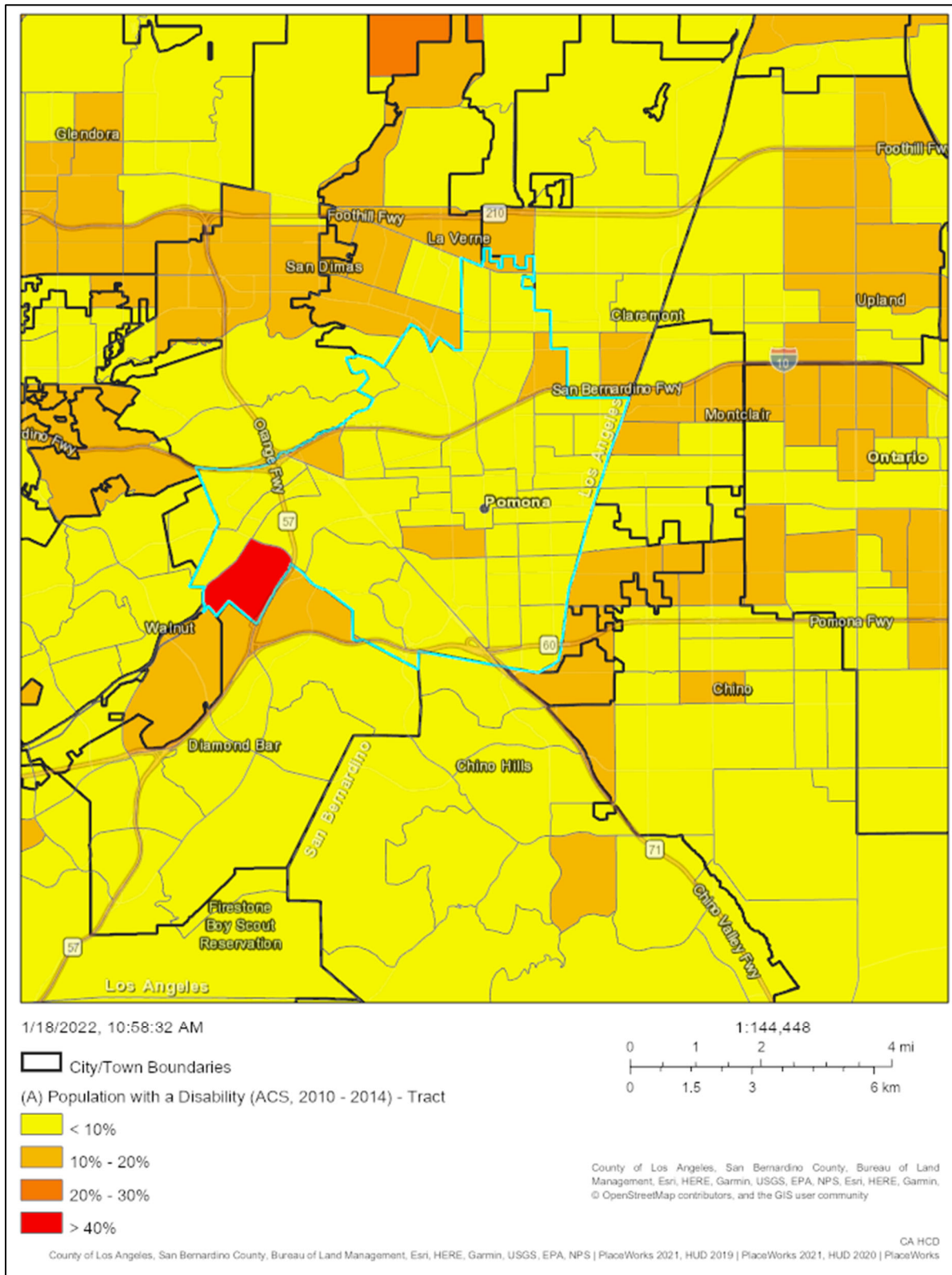
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with a disability in Pomona. **Figure D-14** shows most of the census tracts in Pomona to report persons with disabilities total less than ten percent of the population. On the other hand, **Figure D-15** shows most of the City's census tracts include 10 to 20 percent of the population reporting at least one disability. One census tract in the western region of the City reports over 40 percent of its population having at least one disability. This area includes part of the Cal Poly Pomona campus, agricultural land, and some industrial uses. There is one service providers for persons with disabilities within this region, called Independent Option. Independent Option provides residential, day service, independent and supported living, and foster and adult family supports to people with developmental disabilities. The residential services for persons with developmental disabilities is likely the reason for the greater than 40 percent indicator on the maps.



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Figure D-14: Pomona Population with a Disability, 2010-2014

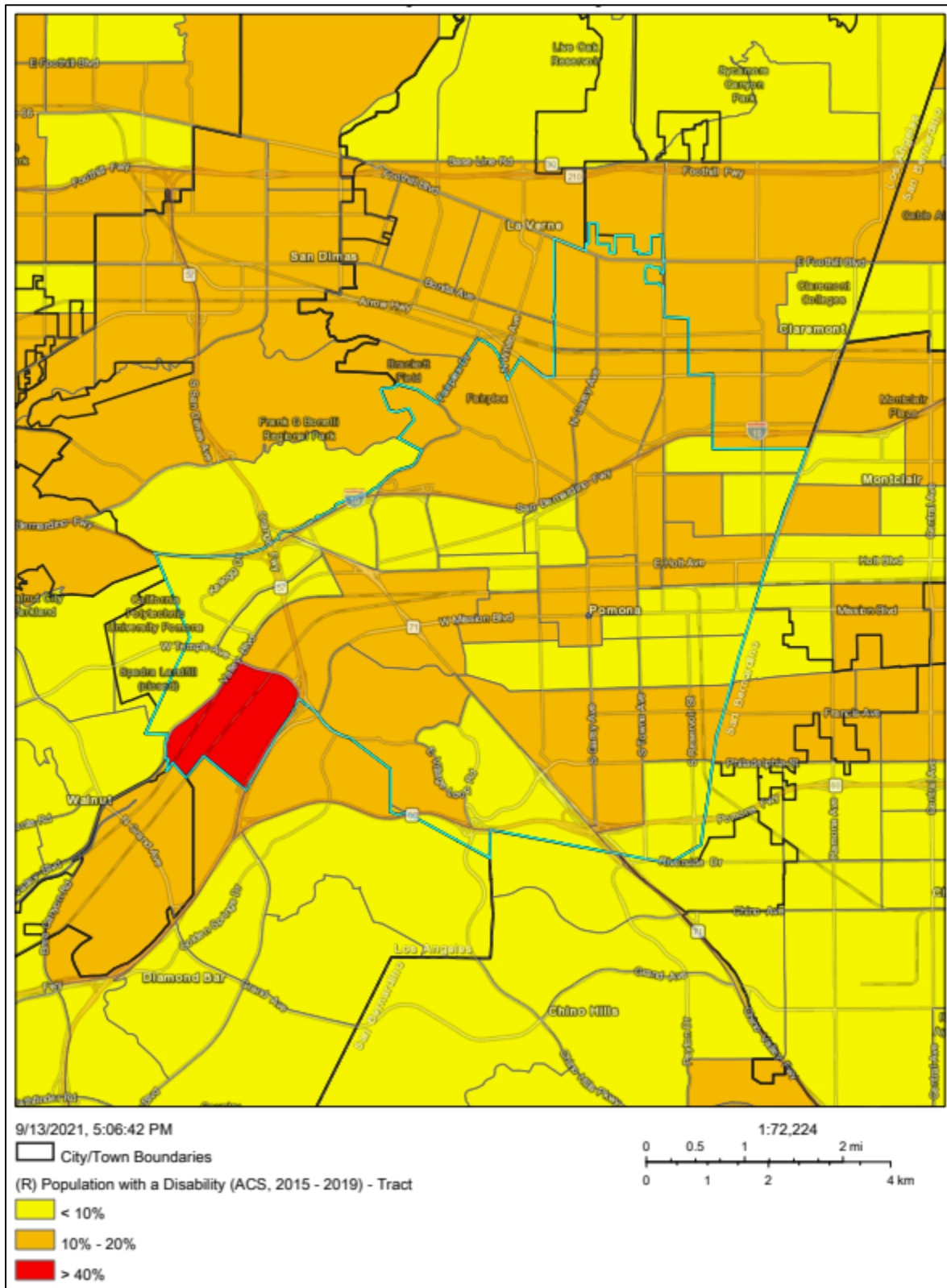


Source: California Department of Housing and Community Development – AFFH Data Viewer



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Figure D-15: Pomona Population with a Disability, 2015-2019



Source: California Department of Housing and Community Development – AFFH Data Viewer



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Income

Regarding household income, the City had a median income of \$60,598, which is lower than the median household income than the County and State in 2019 (\$68,044 and \$75,235 respectively). The data in the **Table D-9** shows that about 18 percent of Pomona resident are considered extremely low income (30% of the area median income). The table also shows that the City has more households earning a low and moderate income (80 to 100 percent of the MFI) than the County and the State, which have higher percentage of households with above moderate incomes.

Additionally, data reviewed in the Integration and Segregation analysis above shows that demographics are changing in the City, and the Hispanic population is growing, while the Non-Hispanic Black population is decreasing. Further analysis of income, using ACS data, shows a key disparity in income between Black, White and Hispanic households in Pomona and the greater Los Angeles areas. In 2019, the median income in los Angeles for Black residents was \$52,136, compared to \$79,304 for White residents and \$61,174 for Hispanic residents. Similarly, in Pomona, the median 2019 household income for Black residents totaled \$61,097, compared to \$65,414 for White residents and \$65,819 for Hispanic residents. Disparities in income may result in migration for new or higher paying opportunities. Out-migration of a demographic can result in increased segregation between White and Non-White residents. Overall, the lower income levels within the City create increased need for affordable and moderate-income housing.

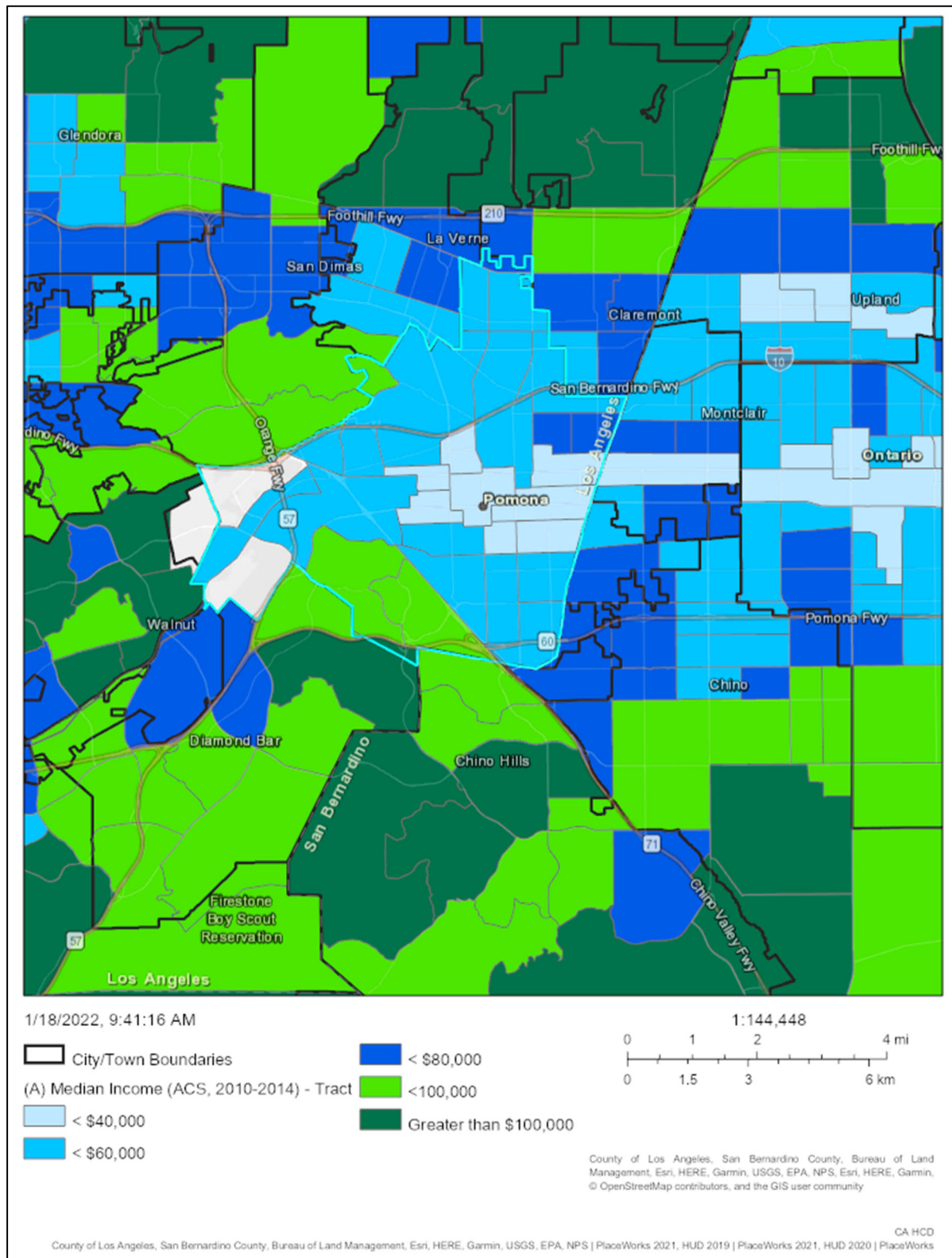
Table D-9: Households by Income, Compared by Geography, 2019			
Households Income	City of Pomona	County of Los Angeles	California
Less than \$10,000	4.8%	5.6%	4.8%
\$10,000-\$14,999	4.2%	4.8%	4.1%
\$15,000-\$24,999	9.1%	8.4%	7.5%
\$25,000-\$34,999	10.0%	8.1%	7.5%
\$35,000-\$49,999	13.2%	11.2%	10.5%
\$50,000-\$74,999	18.2%	15.9%	15.5%
\$75,000-\$99,999	15.0%	12.3%	12.4%
\$100,000-\$149,999	15.3%	15.8%	16.6%
\$150,000-\$199,999	6.0%	7.8%	8.9%
\$200,000 or More	4.2%	10.2%	12.2%
Median Income	\$60,598	\$68,044	\$75,235
Source: American Community Survey, 5-Year Estimates, 2019			

Additionally, **Figure D-16** displays the ACS 2010-2014 data for median income for Pomona and **Figure D-17** displays the ACS data for 2015-2019 for median income. When compared, the maps show that overall income in the City of Pomona has increased, however, the geographic distribution remains similar from 2010 through 2019. The central region of Pomona shows some of the lowest incomes in the City, less than \$40,000 in 2010 and less than \$55,000 in 2019. Additionally, the maps both portray the south western region as having the highest income households and the greater central region having primarily moderate- and low-income households. Overtime, the northern region of the City shows increasingly diverse incomes, where in 2019 some census tracts are moderate and above moderate compared to primarily low and moderate in 2010.



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Figure D-16: Median Income in Pomona, 2010-2014

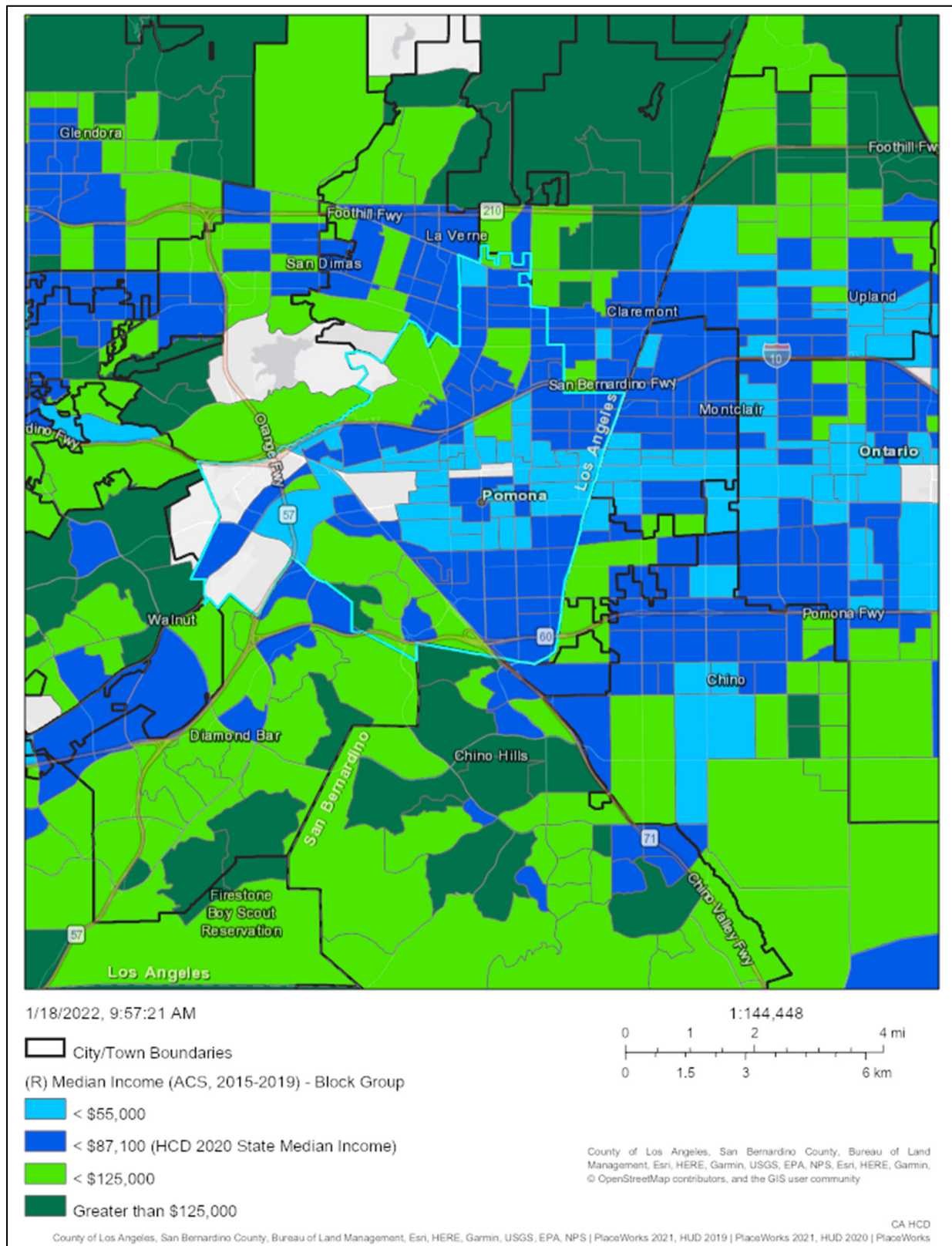


Source: California Department of Housing and Community Development – AFFH Data Viewer



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Figure D-17: Median Income in Pomona, 2010-2014



Source: California Department of Housing and Community Development – AFFH Data Viewer



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Familial Status

Table D-10 displays household type and familial status for the State, County and City. **Figures D-18** through **D-21** also illustrate household types throughout the City. Overall, the City has a larger percentage of family households than the County and State; including family households and married-couple family households. The data in **Table D-10** shows that 22.1 percent of households in Pomona are those with their own children, compared to 28.3 percent in the county and 34 percent in the state. Additionally, Pomona has a slightly higher percentage of households with one or more people ages 60 or older, 38 percent, compared to about 37.9 percent in the County and 29 percent in the State.

Table D-10: Population by Familial Status, Compared by Geography, 2019						
Familial Status	City of Pomona		County of Los Angeles		California	
	2010	2019	2010	2019	2010	2019
Total Households	38,535	39,097	3,217,889	3,316,795	12,392,852	13,044,266
Family Households	79.3%	76.8%	67.4%	66.7%	68.6%	68.7%
Married-Couple Family Households	50.3%	48.3%	45.5%	45.1%	49.8%	49.8%
With Children	30.2%	22.1%	22.9%	28.3%	24.0%	34%
Female Single Parent Households	11.8%	6.1%	8.1%	5.1%	7.2%	4.8%
Male Single Parent Households	4.1%	1.8%	2.8%	1.2%	2.7%	1.3%
Non-Family Households	20.7%	23.1%	32.6%	33.3%	31.4%	31.3%
Households with one or more people 60 years+	19.1%	38.1%	22.6%	37.9%	23.2%	29.2%

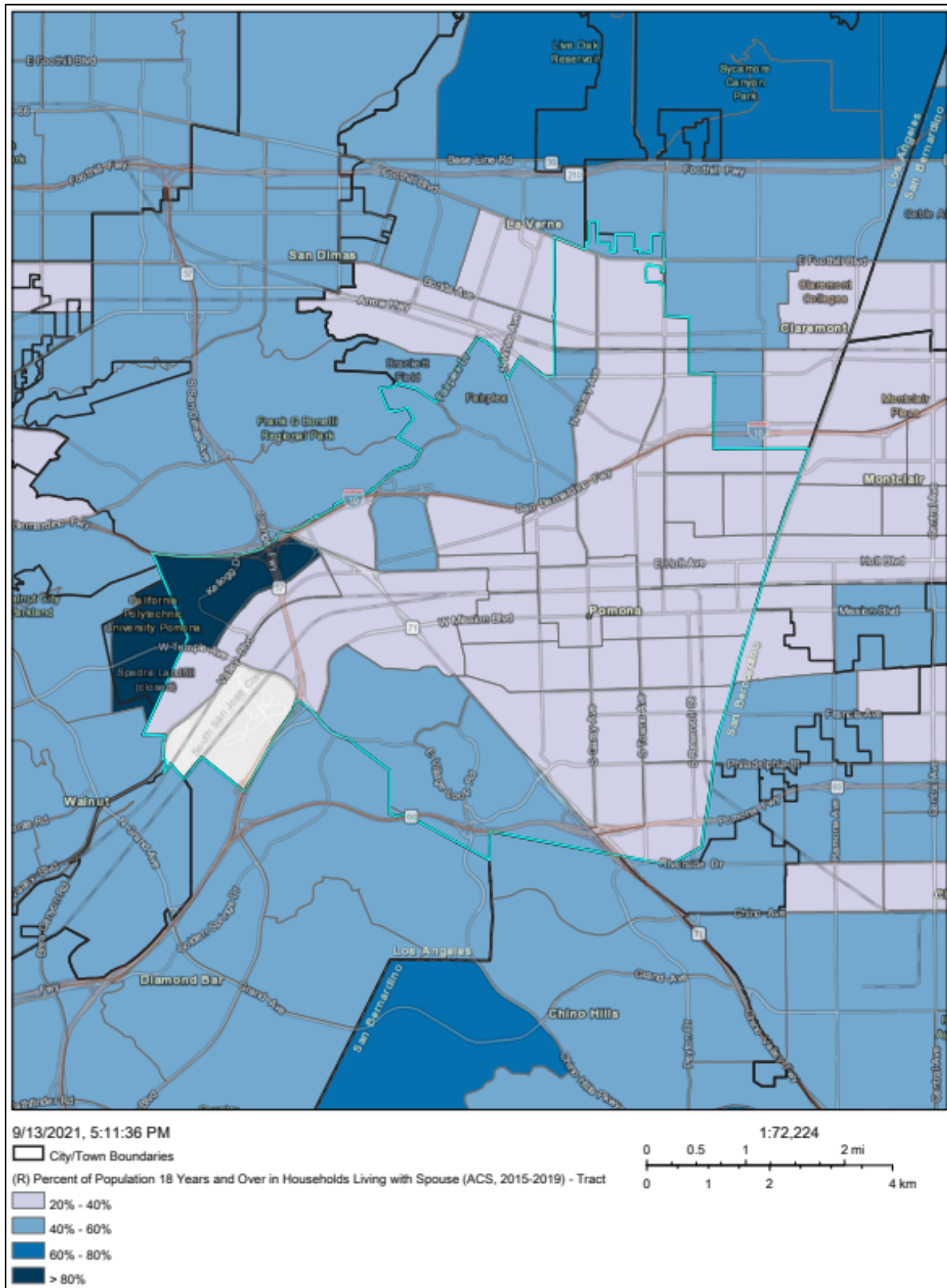
Source: American Community Survey, 5-Year Estimates. 2010 and 2019

Figure D-18 shows the City has evenly dispersed rates married-couple households, because the data in **Table D-10** shows a higher percentage of married couple households than the County and state, but most census tracts include 20-40 percent married-couple households. There are a few census tracts towards the western region of the City which report 40 to 60 percent and over 80 percent married-couple households, but the large majority of the City reports between 20 and 40 percent. Similarly, **Figure D-19** shows lower percentages of children living in married-couple family households, except for higher rates in the southern region of the City which also reported a higher percentage of married-couple households.

Figure D-20 shows there are moderate rates of children living in female households with no spouse present. Two particular census tracts on the western side of the City and towards the center report a higher 40 to 60 percent, when compared to the rest of the City. Census tracts in northern and central regions report approximately 20 to 40 percent of children living in female headed households.

Figure D-21 illustrates very low rates of individuals living alone in the City. All Pomona census tracts report less than 20 percent single-occupancy households.

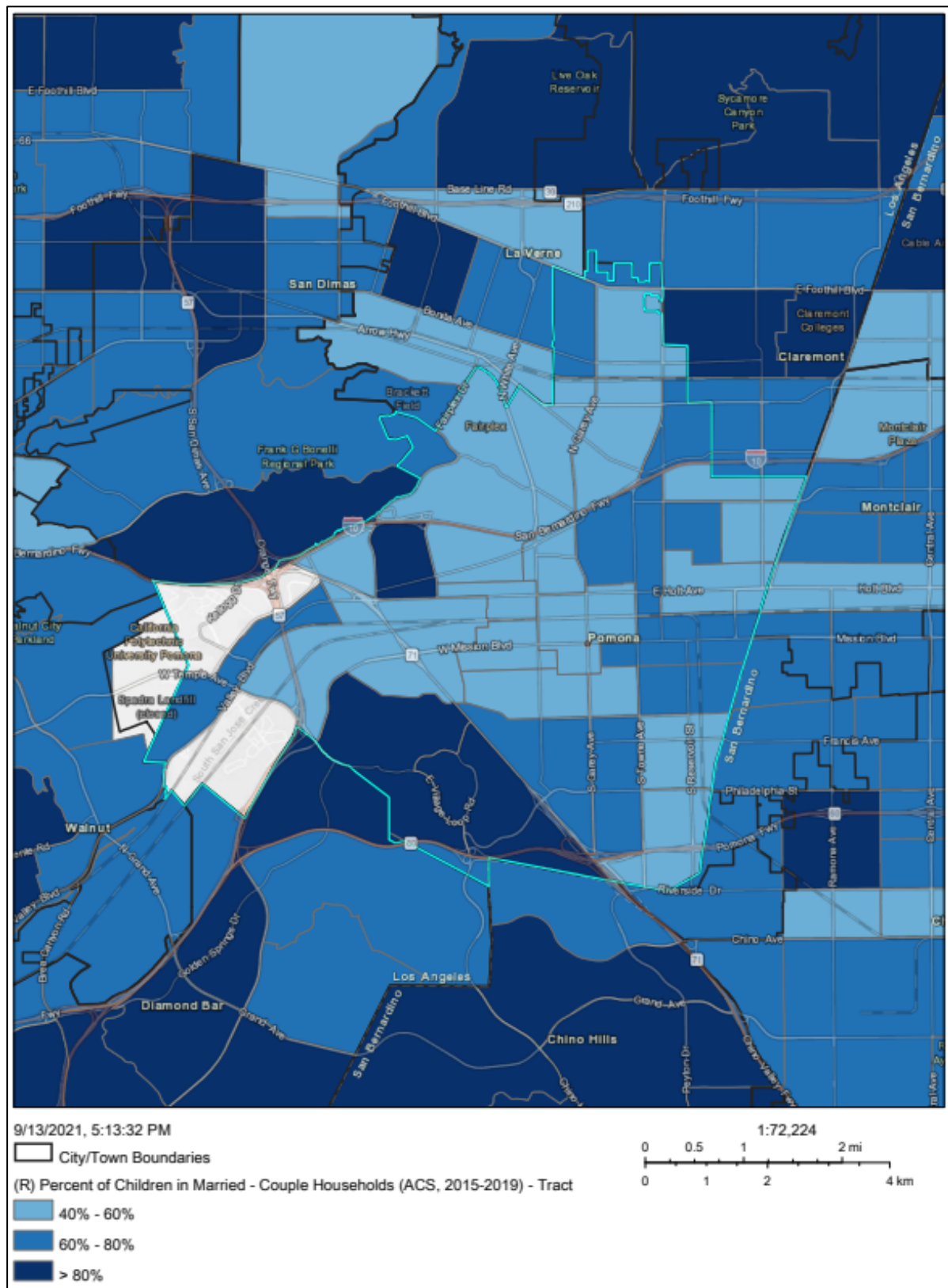
Figure D-18: Pomona Married-Couple Households



Source: California Department of Housing and Community Development – AFFH Data Viewer



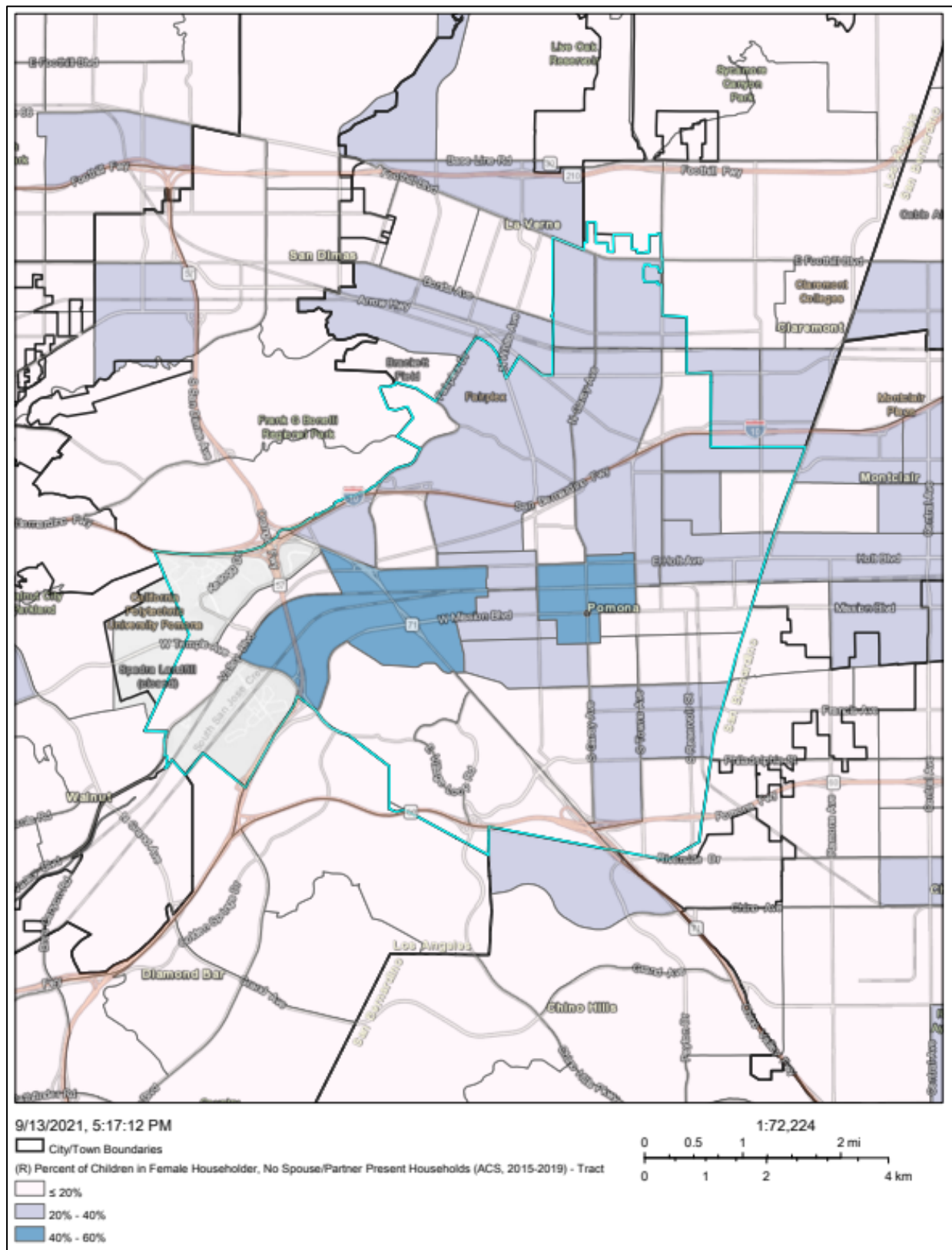
Figure D-19: Children in Married-Couple Households



Source: California Department of Housing and Community Development – AFFH Data Viewer



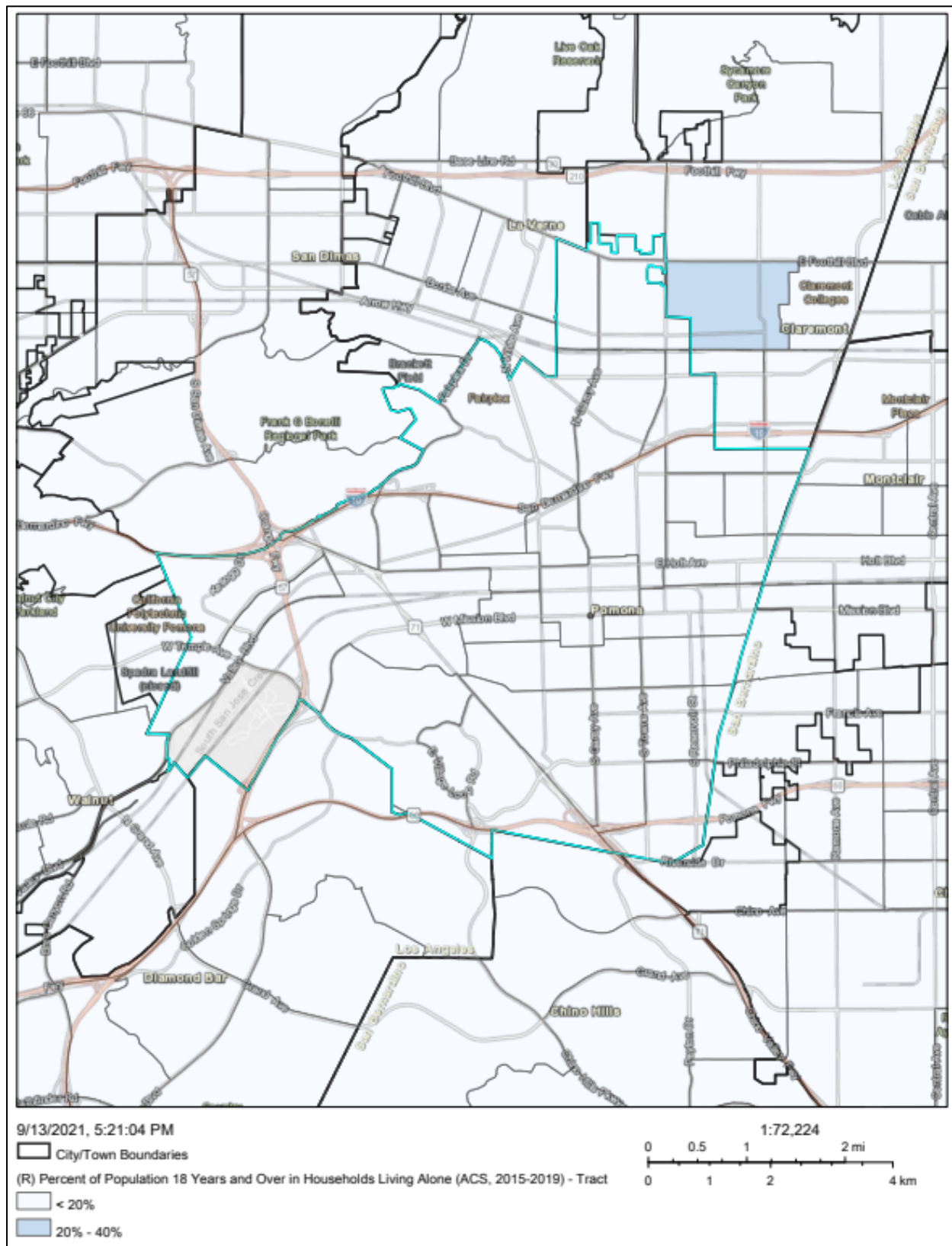
Figure D-20: Children in Female Households with no Spouse Present



Source: California Department of Housing and Community Development – AFFH Data Viewer



Figure D-21: Households Living Alone



Source: California Department of Housing and Community Development – AFFH Data Viewer



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Tenure

Table D-11 displays data for household tenure (owner vs. renter) for the State, County and City. Homeownership is a crucial foundation for helping families with low incomes build strength, stability, and independence. The opportunity for transition into the homebuyer's market is important for persons and households in different communities, homeownership allows for increased stability and opportunity to age in place. The data in the table shows that both the City and the State have higher percentages of households who own their home, while the County of Los Angeles has a higher percentage of households who rent their homes.

Table D-11: Households by Tenure, Compared by Geography, 2019			
Household Tenure	City of Pomona	County of Los Angeles	California
Owner Households	52.7%	45.8%	66.0%
Renter Households	47.2%	68.3%	34.0%
Total Occupied Housing Units	39,097	354,2800	13,044,266

Source: American Community Survey, 5-Year Estimates, 2019.

Overpayment

Table D-12 displays data for households experiencing overpayment or cost burden in the State, County and City. Housing Cost burden has a number of consequences for a household, mainly displacement from their existing living situation creating limited access essential goods and often employment by potentially increasing commute times. The data shows that households in the City experience the highest levels of cost burden above 30 percent but less than 50 percent (75.1 percent). Additionally, households in Pomona experienced higher rates of cost burden great than 50 percent (23.2 percent), compared to the County the State (19.4 percent) but similar to the County (23.3 percent).

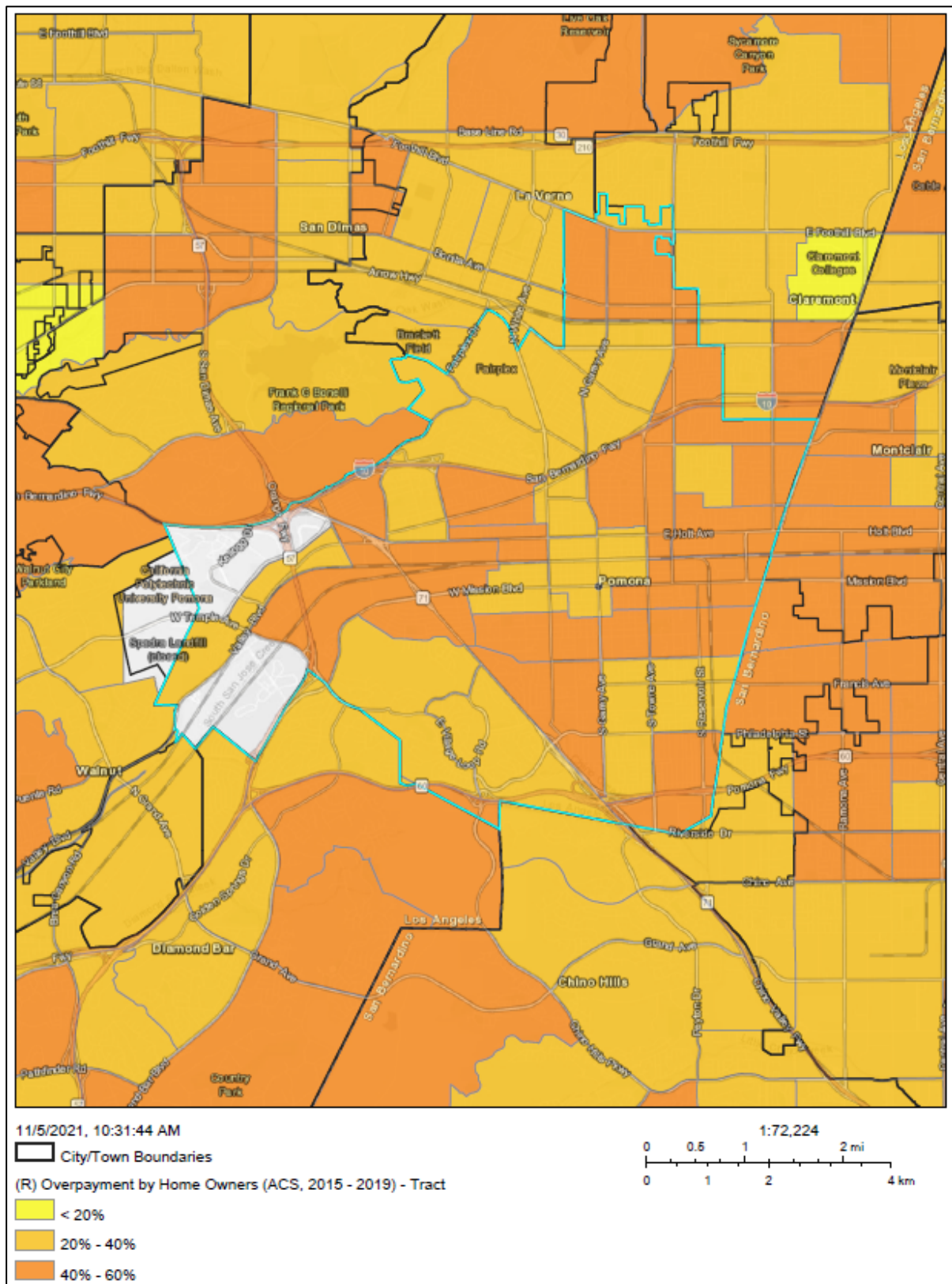
Table D-12: Households by Overpayment, Compared by Geography			
Overpayment/Cost Burden	City of Pomona	County of Los Angeles	California
Cost Burden > 30%	75.1%	74.9%	79.2%
Cost Burden > 50%	23.2%	23.3%	19.4%
Cost Burden Not Available	1.7%	1.7%	1.4%

Source: Consolidated Planning/CHAS Data, 2013- 2017.

Figure D-22 shows overpayment for homeowners and **Figure D-23** shows overpayment for renters. As the two figures illustrate, renters experience overpayment at greater rates than homeowners. Overpayment for homeowners appears to affect the northern and eastern portions of the City. Overall, both renters and homeowners experience high rates of overpayment. This trend is similar with neighboring communities such as the Cities of Ontario, Montclair, and Upland.



Figure D-22: Overpayment by Homeowners

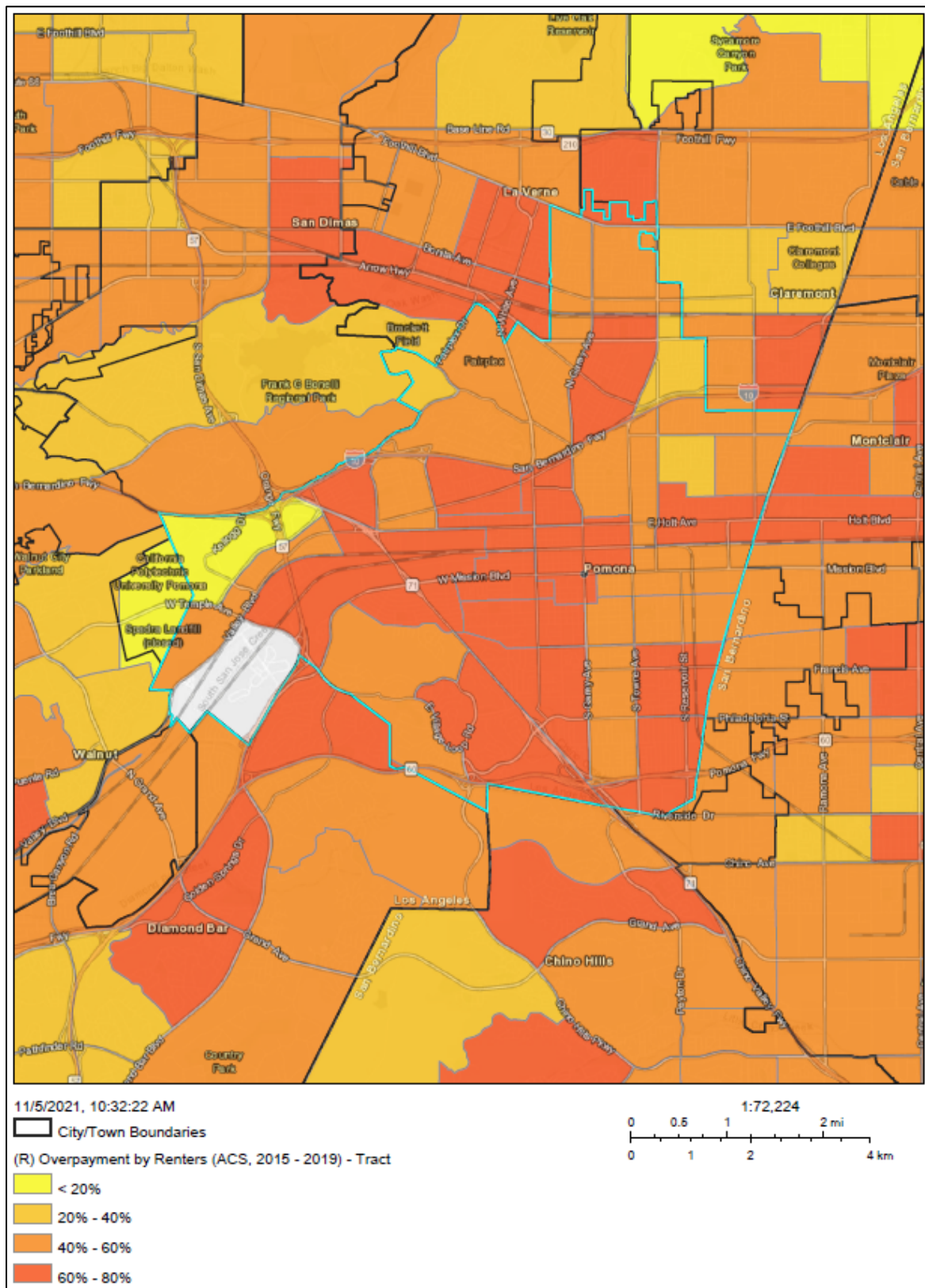


Source: California Department of Housing and Community Development – AFFH Data Viewer



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Figure D-23: Overpayment by Renters



Source: California Department of Housing and Community Development – AFFH Data Viewer



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Overcrowding

Table D-13 displays data for overcrowding in the State, County and City. Overcrowding is defined as between 1.01 and 1.5 persons per room in a household, and severe overcrowding is defined as more than 1.51 persons per room. Overcrowding often occurs when nonfamily members combine incomes to live in one household, such as college students and roommates, it also occurs when there are not enough size appropriate housing options for large or multigenerational families. Owner households in Pomona experience the highest levels of overcrowding (8.4 percent) compared to the County (2.3) and the State (1.6). Overcrowding in owner occupied homes can imply that households live in multigenerational settings or with extended family members. Additionally, the data shows that renter occupied households in both the City and County experienced higher levels of overcrowding than the state. The City and County experienced very low levels of severe overcrowding for both owners and renters (under one percent), however, renter households in the City experienced very high rates of severe overcrowding (8.2percent).

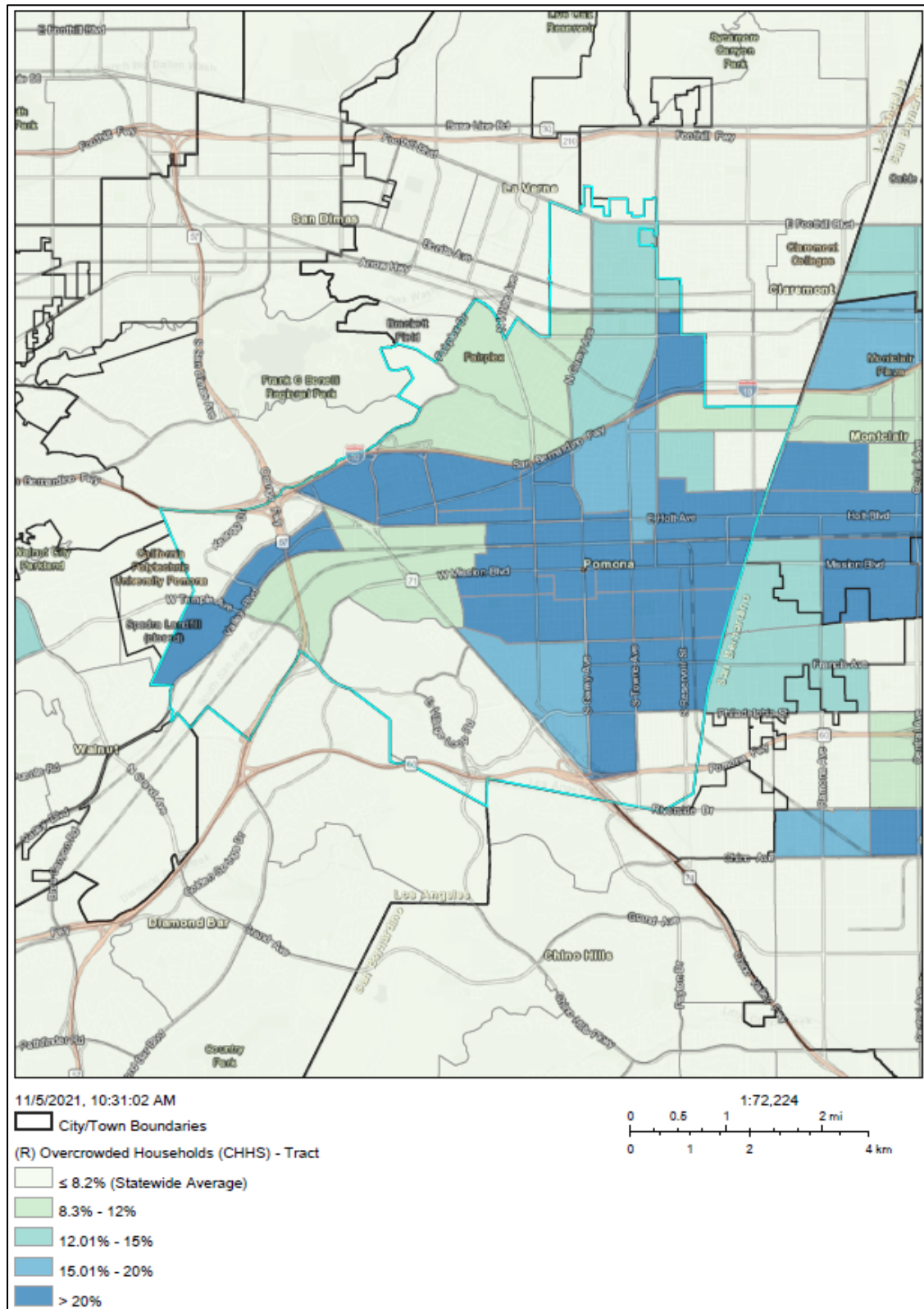
Table D-13: Households by Overcrowding, Compared by Geography			
Overcrowding and Tenure	City of Pomona	County of Los Angeles	California
Owner Households			
Overcrowded	8.4%	2.3%	1.6%
Severely Overcrowded	1.9%	0.2%	0.6%
Renter Households			
Overcrowded	12.7%	7.6%	3.6%
Severely Overcrowded	8.2%	1.2%	2.4%

Source: American Community Survey, 5-Year Estimates, 2019.

Additionally, **Figure D-24** and **D-25** illustrate households overcrowding and severe overcrowding, respectively, throughout the City and neighboring communities. **Figure D-24** shows most of the City experiences some level of overcrowding. The region surrounding the City's downtown area reports the greatest levels of overcrowding with more than 20 percent of households per census tract. As **Figure D-25** shows, this area also reports severe overcrowding, with a one census tract reporting 35 to 65 percent of households being severely overcrowded. During community engagement, multiple participants identified overcrowding as a key housing issue. California Polytechnic State University, Pomona in the City of Pomona draws large numbers of students to the City. To decrease housing costs, students will share rooms and increase total persons living in one unit. Overcrowding is considered living situations where there is more than one person per room, students in Pomona regularly live-in overcrowded units. Additionally, many participants identified multi-generational living as a source of overcrowding. Multi-generational living may be a result of choice due to cultural preference, however, it can also be a result of lack of affordable options. Additionally, if affordable and appropriately sized units are not available in the market, then multigenerational living can result in overcrowding and severe overcrowding. The City has identified **Policy 3.1: Enable Pomona Households to Accommodate Multiple Generations Living Together** in **Section 5: The Plan for** to accommodate multi-generational housing and mitigate overcrowding within the City.



Figure D-24: Overcrowded Households

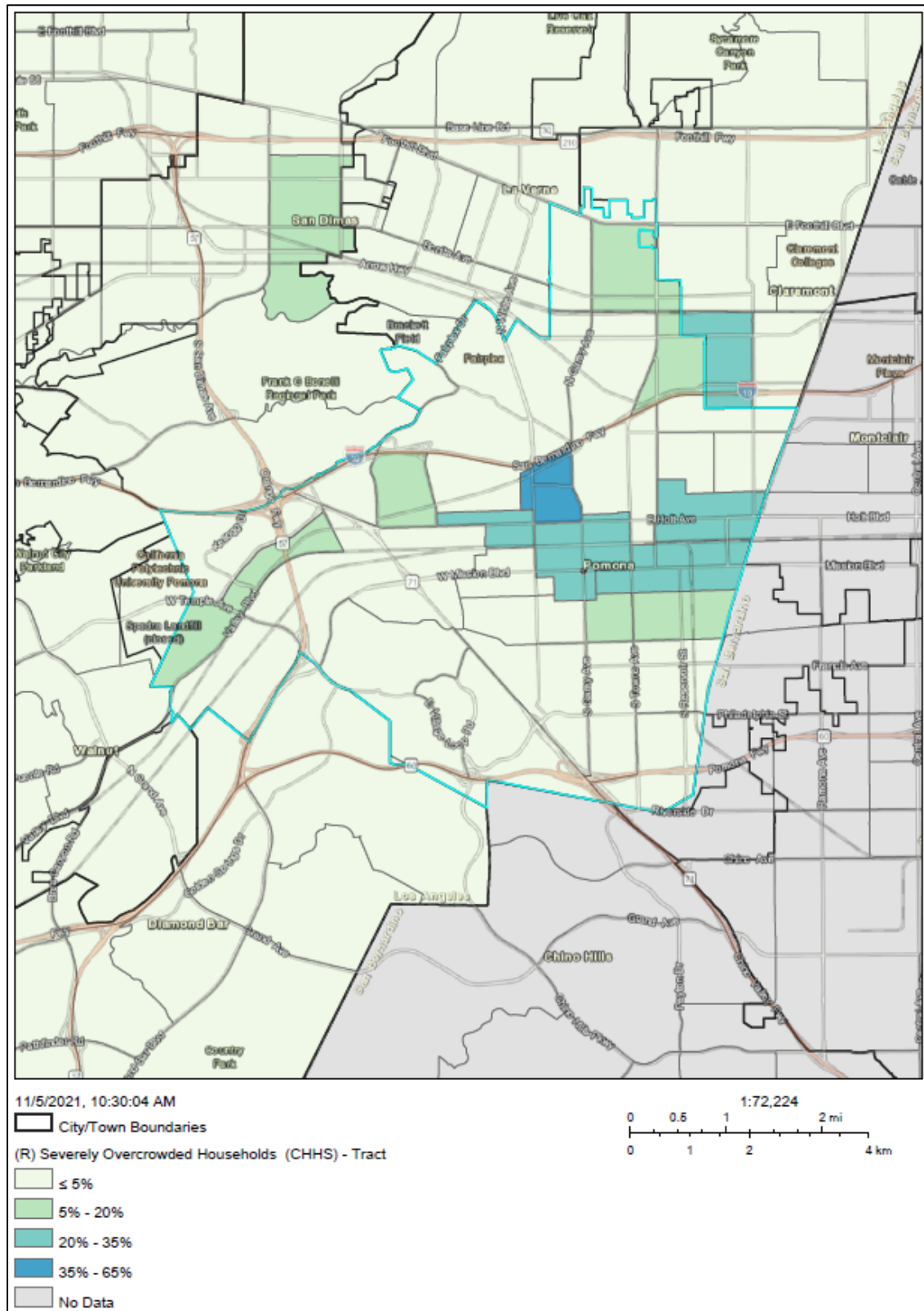


Source: California Department of Housing and Community Development – AFFH Data Viewer



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Figure D-25: Severely Overcrowded Households



Source: California Department of Housing and Community Development – AFFH Data Viewer



Housing Stock in Pomona

Tables D-14 and D-15 display comparative housing stock data for the State, County and City. **Table D-14** below shows data for occupied housing units by type. A variety of housing stock provides increased opportunity in communities for different size and households types. The City of Pomona has the highest percent of traditional single-family housing units (63.3 percent) compare to the County (48.6 percent) and the State (57.7 percent). Overall, Pomona’s housing stock is made up of mostly single-family units (attached and detached). The data also shows that Pomona has about half the amount of multi-family units compare to the County and state, but the highest percentage of mobile homes and other housing types. Both the County and the State have higher percentages of multi-family units (of any type) than the City.

Table D-14: Occupied Housing Units by Type, Compared by Geography			
Housing Unit Type	City of Pomona	County of Los Angeles	California
1, detached	63.3%	48.6%	57.7%
1, attached	6.4%	6.3%	7.0%
2 apartments	1.9%	2.7%	2.4%
3 or 4 apartments	6.1%	5.8%	5.5%
5 to 9 apartments	4.9%	7.9%	6.0%
10 or more apartments	13.2%	27.1%	17.5%
Mobile home or other type of housing	4.3%	1.7%	3.8%

Source: American Community Survey, 5-Year Estimates, 2019.

Table D-15 below displays housing stock by year built or the City, County, and State. A factor used to determine housing condition is the age and state of the home. Older housing generally requires more upkeep, regular maintenance and can cause a cost burden on both renters and homeowners. The data shows that across all regions housing stock growth and development has slowed since 2010. However, Pomona shows the lowest rates of growth since 1980. Majority of the City’s Housing stock was built from 1940 to 1970, compared to the County where majority of housing units were built from 1950 to 1990 and the State (1950 to 2000). Majority of Pomona’s homes are over 50 years old, built prior to 1972 (70.7 percent), homes over 50 years old have an increased likelihood of being in need of more major repairs to key systems and building components. Therefore, these homes are at a higher risk of being in need of repair or replacement. Overall, increased numbers of older housing can lead to displacement, cost burden, and substandard living conditions. Through code enforcement programs, the City identified 134 units as in need of maintenance or some repair.

Substandard units are those in need of repair or replacement. Based on 2019 ACS data, 1.5% of housing units in Pomona display substandard conditions. Approximately 0.4% of housing units lack complete plumbing facilities and 1.1% lack complete kitchen facilities. Based on this data, at a minimum 586 units (1.5%) within Pomona are substandard and in need of rehabilitation. In the Los Angeles Service Area, 5.7% of homes have a basic housing quality problem – either a moderate or severe physical problem.⁸ The

⁸ National Center for Healthy Housing, Los Angeles CA Metrics, 2018. Accessed Online: January 18, 2022. <https://nchh.org/tools-and-data/data/state-of-healthy-housing/rankings/location/los-angeles-ca/?data-year=2018>.



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current distribution of the age of homes in Pomona also indicates that a majority of homes in the City were built prior to the 1990 Americans with Disabilities Act (ADA), which may result in a lack of accessible homes for those residents experiencing a disability. The City's older housing stock also reflects a rapidly gaining need to rehabilitate housing to meet minimum livability and quality requirements, which is a barrier to many homeowners and residents in Pomona who have a lower income or a fixed income.

Table D-15: Housing Unit by Type, Compared by Geography			
Year Built	City of Pomona	County of Los Angeles	California
Built 2014 or later	1.4%	1.2%	1.7%
Built 2010 to 2013	1.0%	1.2%	1.7%
Built 2000 to 2009	4.8%	5.4%	11.2%
Built 1990 to 1999	6.9%	6.3%	10.9%
Built 1980 to 1989	15.2%	11.6%	15.0%
Built 1970 to 1979	10.7%	13.8%	17.6%
Built 1960 to 1969	14.9%	14.8%	13.4%
Built 1950 to 1959	25.1%	20.5%	13.4%
Built 1940 to 1949	7.5%	10.4%	5.9%
Built 1939 or earlier	12.5%	14.8%	9.1%
Source: American Community Survey, 5-Year Estimates, 2019.			

Future Growth Needs

The City's future growth need is based on the RHNA production of 2,799 very low, 1,339 low-income units and 1,510 moderate income units within the 2021-2029 planning period. **Appendix C: Candidate Sites and Housing Resources** of this Housing Element shows the City's ability to meet its 2021-2029 RHNA need at all income levels.

5. Displacement Risk

The potential for economic displacement risk can result from a variety of factors, including large-scale development activity, neighborhood reinvestment, infrastructure investments, and changes in local and regional employment opportunity. Economic displacement can be an inadvertent result of public and private investment, where individuals and families may not be able to keep pace with increased property values and market rental rates. Affordable covenants help to ensure that certain housing units remain affordable for an extended period. Covenants help balance the housing market in a community and provide lasting affordable options to low and very low-income households.

Urban Displacement

The Urban Displacement Project developed a neighborhood change database to map neighborhood transformations and identify areas vulnerable to gentrification and displacement. This data was developed to assist local decision makers and stakeholders better plan for existing communities and provide additional resources to areas in need or at-risk of displacement and gentrification. **Table D-16** provides the criteria used to identify each displacement typology and the total number of Pomona Census Tracts that currently fall within each category.



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Table D-16: Displacement Typology Criteria and Pomona Census Tracts		
Modified Types and Criteria	Pomona Census Tracts	
Low-Income/Susceptible to Displacement Low or mixed low-income tract in 2018.	6037402702 6037402801 6037402600 6037402303 6037402301	6037402406 6037402304 6037402501 6037402402 6037402502
Ongoing Displacement of Low-Income Households - Low or mixed low-income tract in 2018. - Absolute loss of low-income households, 2000-2018.	6037402804	
At Risk of Gentrification - Low or mixed low-income tract in 2018. - Housing affordable to low or mixed low-income households in 2018. - Didn't gentrify 1990-2000 OR 2000-2018. - Marginal change in housing costs OR Zillow home or rental value increases in the 90th percentile between 2012-2018. - Local and nearby increases in rent were greater than the regional median between 2012-2018 OR the 2018 rent gap is greater than the regional median rent gap.	--	
Early/Ongoing Gentrification - Low or mixed low-income tract in 2018. - Housing affordable to moderate or mixed moderate-income households in 2018. - Increase or rapid increase in housing costs OR above regional median change in Zillow home or rental values between 2-12-2018. - Gentrified in 1990-2000 or 2000-2018.	6037408800 6037402803 6037401704	
Advanced Gentrification - Moderate, mixed moderate, mixed high, or high-income tract in 2018. - Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018. - Marginal change, increase, or rapid increase in housing costs. - Gentrified in 1990-2000 or 2000-2018.	--	
Stable Moderate/Mixed Income Moderate, mixed moderate, mixed high, or high-income tract in 2018.	6037403316 6037403317 6037403000 6037402904 6037402903 6037402405 6037402200	6037402102 6037401703 6037402001 6037402703 6037402706 6037402705
At Risk of Becoming Exclusive - Moderate, mixed moderate, mixed high, or high-income tract in 2018. - Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018. - Marginal change or increase in housing costs.	6037402902 6037403318	
Becoming Exclusive Moderate, mixed moderate, mixed high, or high-income tract in 2018.	6037402101	



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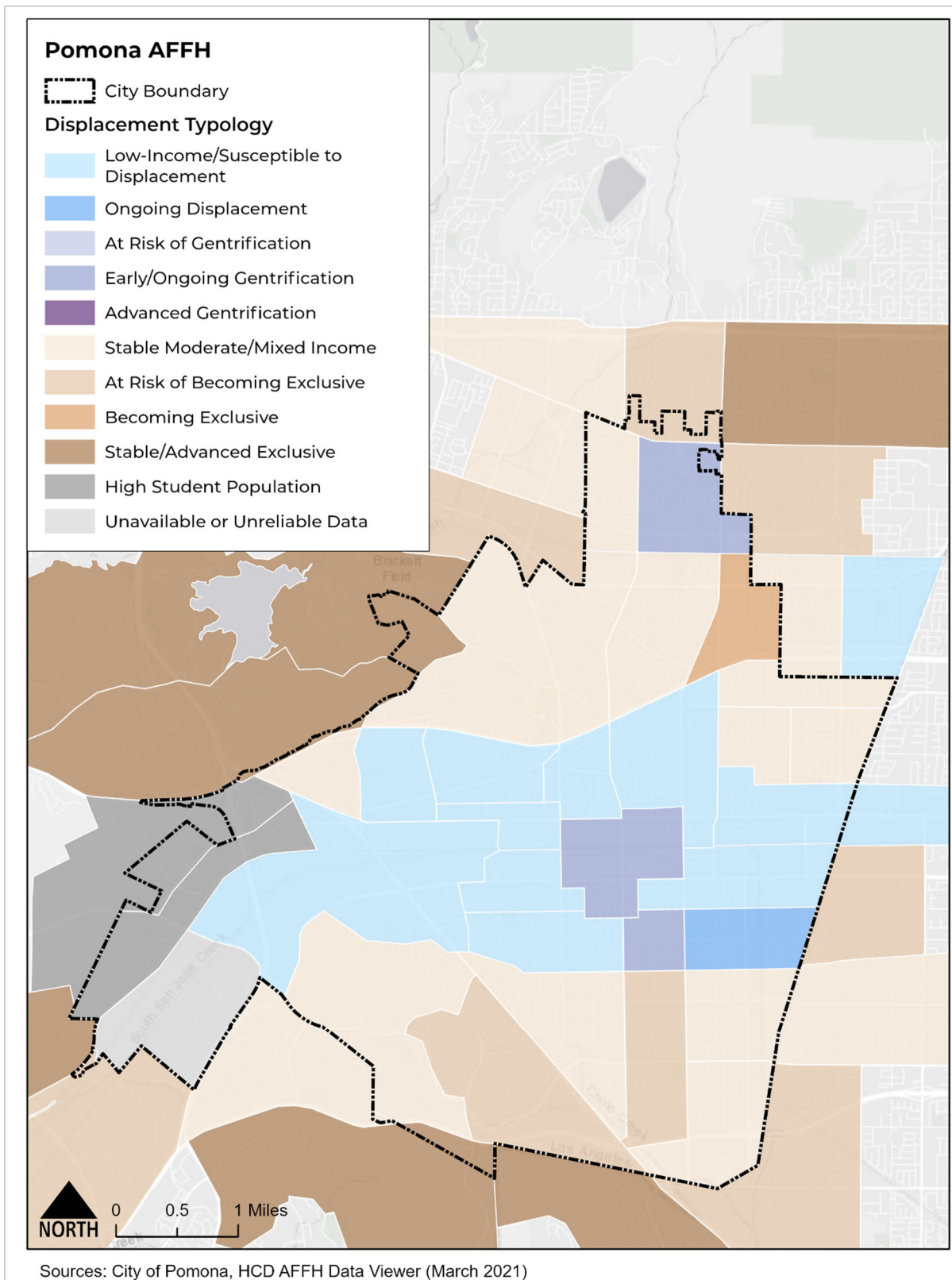
Table D-16: Displacement Typology Criteria and Pomona Census Tracts	
Modified Types and Criteria	Pomona Census Tracts
- Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018. - Rapid increase in housing costs. - Absolute loss of low-income households, 2000-2018. - Declining low-income in-migration rate, 2012-2018. - Median income higher in 2018 than in 2000.	
Stable/Advanced Exclusive - High-income tract in 2000 and 2018 - Affordable to high or mixed high-income households in 2018. - Marginal change, increase, or rapid increase in housing costs.	6037403321
High Student Population	6037402403
Source: Urban Displacement Project, University of California Berkeley (2021).	

Table D-16 and **Figure D-26** show there are a number of census tracts located within the City of Pomona which are susceptible to displacement/actively undergoing displacement and a few which are in early and ongoing stages of gentrification. These census tracts are predominantly located around the City's downtown area. Existing residents in these areas may require additional assistance in maintaining affordable housing. Thirteen census tracts are currently categorized as stable moderate/mixed-income. Two census tracts along the City's southern edge are at risk of becoming exclusive and one census tract along the City of Claremont border is currently becoming exclusive. A small portion of census tract 6037403321 is located within the City of Pomona border and categorized as stable/advanced exclusive; Hidden Valley Townhomes is the only residential community located within Pomona's jurisdiction in this census tract.



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Figure D-26: Urban Displacement Project - Gentrification and Displacement





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Inventory of Assisted Affordable Housing and At-Risk Units

The City of Pomona has multiple housing projects which include units with affordability covenants. According to **Table D-17** below, the City has two projects with affordable units at risk of conversion to market rate, totaling 464 affordable units at risk.

Table D-17: Assisted Housing Development Inventory					
Development Name	Covenant Expiration	Tenant Type	Affordable Units	Type of Assistance	Housing Type
Emerson Village	N/A ¹	Very low and low income (seniors & disabled)	164	FHA Mortgage Insurance, 223(d)(3) & Section 8 New Construction	Rental
Park & Plaza Apts.	2026	Very low, low, and moderate income (seniors & families)	302	Multi-family Housing Revenue Bonds and RDA Set-Aside Funds	Rental
Hamilton/ Fernleaf Street	2032	Moderate income	8	RDA Set-Aside Funds	For-sale (single-family units)
Mission Promenade	2034	Moderate income	6	RDA Set-Aside Funds	For-sale (attached condominiums)
Pasadena St.	2046	Low income	1	RDA Set-Aside Funds	Rental
		Moderate income	5		
Murchison Ave.	2049	Moderate income	1	RDA Set-Aside Funds	For-sale (detached condominiums)
Palomares Walk	2050	Moderate income	4	RDA Set-Aside Funds (Land Write-Down)	For-sale (detached condominiums)
North Towne Ave. Apts.	2057	Very low, low, and moderate income	26	RDA Set-Aside Funds	Rental
Las Brisas - Beaver Court	2059	Very low income (seniors)	80	RDA Set-Aside Funds and HUD Section 202	Rental
Portofino Low and Very Low-Income Villas	2059	Very low and low income (seniors)	174	N/A	Rental
Prototypes	2060	Very low and low income	32	HOME Funds	Rental
Drake Manor	2063	Very low income	110	Bond Financing	Rental
Tivoli Plaza / Shield Village	2064	Very low and low income (seniors)	63	RDA Set-Aside Funds	Rental
		Very low and low income (families)	27		
La Esperanza	2060	Very low and low income (seniors)	70	HOME Funds and HUD Section 202	Rental
Edison Lofts	2064	Low and moderate-income work/live units	4	RDA Set-Aside Funds	Rental
TOTAL ASSISTED UNITS			1,077		
1. The deed restriction for Emerson Village expired in 2018; however, the units are still being rented at affordable rates. Source: City of Pomona.					



Cost of Preservation and Replacement Analysis

Jurisdictions are required by State Housing Element Law to analyze assisted housing that may convert from lower income to market rate housing over the next 10 years. State law identifies housing assistance as a rental subsidy, mortgage subsidy or mortgage insurance to an assisted housing development. Government assisted housing may convert to market rate housing for several reasons, including expiring subsidies, mortgage repayments, or expiration of affordability restrictions. This section will provide:

- An inventory of assisted housing units that are at risk of converting to market-rate housing,
- An analysis of the costs of preserving and/or replacing these units,
- Resources that could be used to preserve at-risk units,
- Program efforts for preservation of at-risk housing units, and
- Quantified objectives for the number of at-risk units to be preserved during the Housing Element planning period.

Inventory of Units at Risk

There are a total of 466 assisted housing units in Pomona at-risk of converting to market-rate between 2021 and 2031. These units are listed in **Table D-18**.

Table D-18: Units “At-Risk” of Conversion (2021-2031)					
Project Name	Assisted Units	Unit Type		Assistance Program	Earliest Possible Date of Conversion
		1-bed	2-bed		
Emerson Village	164	156	8	Very low and low income (seniors & disabled)	N/A ²
Park & Plaza Apts. ¹	302	302	0	Very low, low, and moderate income (seniors & families)	2026
TOTAL AT-RISK UNITS	466	458	8		
1. Breakdown of number of units by bedrooms is unavailable – units assumed at one-bedroom. 2. The deed restriction for Emerson Village expired in 2018; however, the units are still being rented at affordable rates. <i>Source: City of Pomona.</i>					

To address the risk of affordable units converting to market rate housing, the City has identified **Program 2.7A** to monitor these units. The City will actively work to create programs and seek additional funding in which the focus is to preserve these units beyond the expiration of the covenant so that residents have a variety of affordable housing options.

Cost of Preservation

Preserving or replacing units which will be at-risk of conversion to market-rate housing could be achieved in several ways including renewal of the HUD contract for an additional 10 years, transfer of ownership to a non-profit organization, provision of rental assistance from other sources of funding or constructing a new project that provides assisted units. The strategy scenario considered below provides local rental subsidy to residents. The rent subsidy scenario would provide financial assistance to residents if their affordable units converted to market rate. To determine the subsidy needed, Fair Market Rents determined by HUD were compared to market rate rents for properties with recent rental data.



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Table D-19: Estimated Monthly Subsidy to Preserve “At-Risk” Units						
Unit Size	Monthly Rents		Number of Units At-Risk	Difference	Monthly Subsidy	Annual Subsidy
	Fair Market Rents ¹	Market Rate ²				
Efficiency	\$1,384	\$1,801	0	\$417	--	--
1-Bedroom	\$1,604	\$1,906	458	\$302	\$138,316	\$1,659,792
2-Bedroom	\$2,044	\$2,304	8	\$260	\$2,080	\$24,960
3-Bedroom	\$2,693	N/A	0	N/A	--	--
4-Bedroom	\$2,933	N/A	0	N/A	--	--
TOTAL SUBSIDY COST						\$1,684,752
Source:						
1. HUD FY 2022 Fair Market Rent Documentation System – Los Angeles						
2. Kimley-Horn and Associate Analysis – based on apartments listed for rent across 8 properties on September 29, 2021.						

Cost of Replacement

The City of Pomona may also consider the cost of replacing the units with new construction. Construction cost estimates include all hard and soft costs associated with construction in addition to per unit land costs. The analysis assumes the replacement units are apartments with concrete block with steel frame buildings and parking provided on-site. Square footage estimates are based on estimated size of units to be replaced and assume housing units are developed on multi-family zoned properties. Land costs have been determined on a per unit basis.

Table D-20: Replacement Cost by Unit Type					
Size of Unit	Cost Per Square Foot ¹	Average Square Foot/Unit ²	Replacement Cost/Unit ³	Number of Units	Total Replacement Cost
Efficiency	\$118	486.8	\$57,442	0	--
1-Bedroom	\$118	671.3	\$79,213	458	\$36,279,737
2-Bedroom	\$118	992.4	\$117,103	8	\$936,826
3-Bedroom	\$118	N/A	--	--	--
4-Bedroom	\$118	N/A	--	--	--
TOTAL REPLACEMENT COST					\$37,216,563
Source:					
1. International Code Council – August 2020 Report.					
2. Kimley-Horn and Associate Analysis – based on apartments listed for rent across 8 properties on September 29, 2021.					
3. Includes financing and land acquisition costs of \$30,000 per unit.					

Resources to Preserve At-Risk Units

A variety of programs exist to help cities acquire, replace, or subsidize at-risk affordable housing units. The following summarizes financial resources available:

- **Community Development Block Grant (CDBG)** – CDBG funds are awarded to cities on a formula basis for housing activities. The primary objective of the CDBG program is the development of viable communities through the provision of decent housing, a suitable living environment and economic opportunity for principally low- and moderate-income persons. Eligible activities include administration, fair housing, energy conservation and renewable energy sources, assistance for economic development, public facilities and improvements and public services.
- **HOME Investment Partnership** – Local jurisdiction can receive funds by formula from the Department of Housing and Urban Development (HUD) to increase the supply of decent, safe,



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sanitary, and affordable housing to lower income households. Eligible activities include housing acquisition, rehabilitation, and development, homebuyer assistance, and rental assistance.

- **Section 8 Rental Assistance Program** – The Section 8 Rental Assistance Program provides rental assistance payments to owners of private, market rate units on behalf of very low-income tenants, senior citizens, disabled and/or handicapped persons, and other individuals for securing affordable housing.
- **Section 202/811 Program** – Non-profit and consumer cooperatives can receive no-interest capital advances from HUD under the Section 202 program for the construction of very low-income rental housing with the availability of supportive services for seniors and persons with disabilities. These funds can be used in conjunction with Section 811, which can be used to develop group homes, independent living facilities and immediate care facilities. The capital advance funding can also provide project rental assistance for the properties developed using the funds. Eligible activities include acquisition, rehabilitation, new construction, and rental assistance.
- **California Housing Finance Agency (CalHFA) Multifamily Programs** – CalHFA’s Multifamily Programs provide permanent financing for the acquisition, rehabilitation, and preservation of new construction of rental housing that includes affordable rents for low- and moderate-income families and individuals. One of the programs is the Preservation Loan program which provides acquisition/rehabilitation and permanent loan financing designed to preserve or increase the affordability status of existing multifamily housing projects.
- **Low-Income Housing Tax Credit (LIHTC)** – This program provides tax credits to individuals and corporations that invest in low-income rental housing. Tax credits are sold to those with high tax liability and proceeds are used to create housing. Eligible activities include new construction, rehabilitation, and acquisition of properties.
- **California Community Reinvestment Corporation (CCRC)** – The California Community Reinvestment Corporation is a multifamily affordable housing lender whose mission is to increase the availability of affordable housing for low-income families, seniors, and residents with special needs by facilitating private capital flow from its investors for debt and equity to developers of affordable housing. Eligible activities include new construction, rehabilitation, and acquisition of properties.

Qualified Entities to Preserve At-Risk Units

The following organizations have the experience and capacity to potentially assist in preserving at-risk units:

- | | |
|---|--|
| • Century Housing | • Jamboree Housing Corporation |
| • Coalition for Economic Survival | • Neighborhood Housing Services of the Inland Empire (NHSIE) |
| • Community Partnership Development Corporation | • Nexus for Affordable Housing, Inc. |
| • Foundation for Quality Housing Opportunities Inc. | • American Family Housing |
| • Housing Corporation of America | • Southern California Housing Development Corporation |



Quantified Objectives

Housing Element law requires that cities establish the maximum number of units that can be preserved over the planning period. The City's objective is to preserve the 466 affordable housing units "at-risk" of converting to market rate through policy programs provided in **Section 5: The Plan for Pro Housing Pomona**.

SB 330 – Housing Crisis Act of 2019

Effective January 1, 2020, Senate Bill 330 (SB 330) aims to increase residential unit development, protect existing housing inventory, and expedite permit processing. Under this legislation, municipal and county agencies are restricted in ordinances and policies that can be applied to residential development. The revised definition of "Housing Development" now contains residential projects of two or more units, mixed-use projects (with two-thirds of the floor area designated for residential use), transitional, supportive, and emergency housing projects. SB330 sets a temporary 5-year prohibition of residential density reduction associated with a "housing development project", from January 1, 2020, to January 1, 2025. For example, during this temporary prohibition, a residential triplex cannot be demolished and replaced with a duplex as this would be a net loss of one unit.

None of the housing strategy sites contain existing housing with low-income tenants who will be displaced if the sites redevelop. To the extent that there is existing housing, all housing must be replaced (Government Code Section 66300). The City has developed a publicly available application and informational sheet about SB 330 which outlines the processes for unit replacement, vesting eligibility under SB 330 and vesting timelines in Pomona. The application and fact sheet are on the City's web-based document portal and available through the Planning Divisions' Applications and Fees homepage. SB 330 also provides relocation payments to existing low-income tenants. The State has also adopted just cause eviction provisions and statewide rent control to protect tenants from displacement. The City is committed to making diligent efforts to engage underrepresented and disadvantaged communities in studying displacement.

6. Analysis of Sites Pursuant to AB 686

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification requirement involves not only an analysis of site capacity to accommodate the RHNA (provided in **Appendix C: Candidate Sites and Housing Resources**), but also whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

- **Figures D-27 through D-33** below identify the sites to accommodate future housing, as identified in the adequate sites analysis, overlaid on demographic and fair housing data using AFFH data layers for segregation and integration and access to opportunity provided through HCD's AFFH data and mapping resources.
- **Figure D-27** – Pomona Proposed RHNA Sites, Hispanic/Latino, 2018
- **Figure D-28** – Pomona Proposed RHNA Sites, Non-White Population 2018
- **Figure D-29** – Pomona Proposed RHNA Sites, Low and Moderate Income, 2015
- **Figure D-30** – Pomona Proposed RHNA Sites, Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)



- **Figure D-31** – Pomona Propose RHNA Sites, Racially Concentrated Areas of Affluence (RCAA)
- **Figure D-32** – Pomona Propose RHNA Sites, TCAC Areas of Opportunity
- **Figure D-33** – Pomona Propose RHNA Sites, Urban Displacement

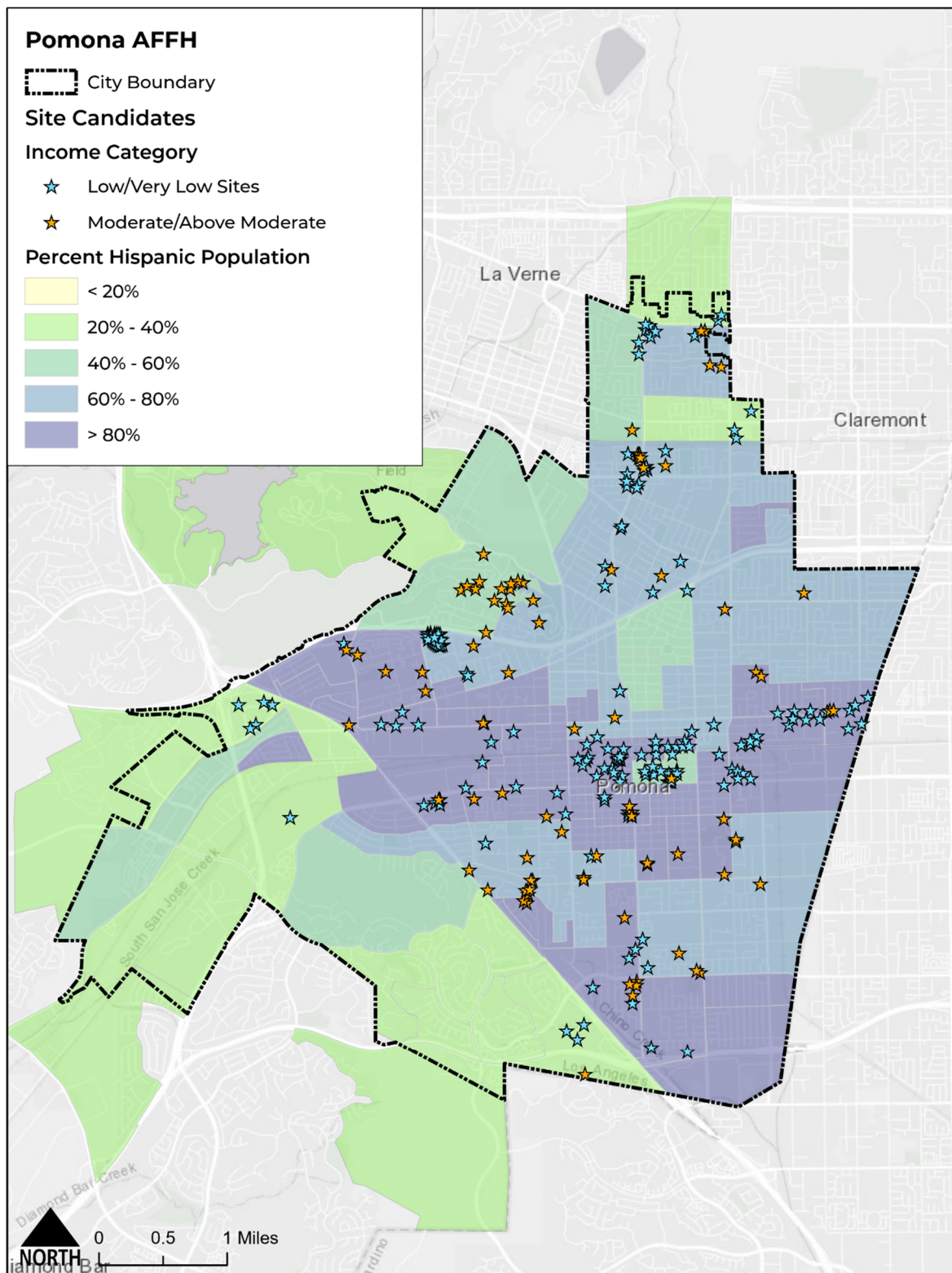
Figure D-27 shows the proposed candidate sites to meet the RHNA for Pomona in relation to the location of residents of Hispanic origin. These sites take into consideration access to vital goods, services, and public transportation and are therefore ideal areas for the City to focus much of its future housing growth. It is anticipated that accessory dwelling unit (ADU) growth, including growth for affordable ADUs, will occur in the less dense areas of the community. **Figure D-27** shows the following findings:

- 15 proposed sites to accommodate the RHNA allocation (totaling 1,887 potential units, or 13.9% of the total potential units) are located within block groups that have a percentage of the population that identifies as Hispanic between 20 and 40 percent. Of those units, 696 are proposed as affordable to low and very low incomes.
- 32 proposed sites to accommodate the RHNA allocation (totaling 917 potential units, or 6.7% of the total potential units) are located within block groups that have a percentage of the population that identifies as Hispanic between 40 and 60 percent. Of those units, 279 are proposed as affordable to low and very low incomes.
- 94 proposed sites to accommodate the RHNA allocation (totaling 3,536 potential units, or 26.0% of the total potential units) are located within block groups that have a percentage of the population that identifies as Hispanic between 60 and 80 percent. Of those units, 943 are proposed as affordable to low and very low incomes.
- 110 proposed sites to accommodate the RHNA allocation (totaling 7,283 potential units, or 53.5% of the total potential units) are located within block groups that have a percentage of the population that identifies as Hispanic above 80 percent. Of those units, 1,851 are proposed as affordable to low and very low incomes.

The data shows that the proposed candidate sites to meet the RHNA allocation are dispersed throughout the community with an emphasis on locating units where there is a high level of access to important public services and transit. The distribution of potential units does not disproportionately impact areas with larger concentrations of the Hispanic population.



Figure D-27: Pomona Proposed RHNA Sites, Hispanic/Latino, 2018



Sources: City of Pomona, HCD AFFH Data Viewer (March 2021)



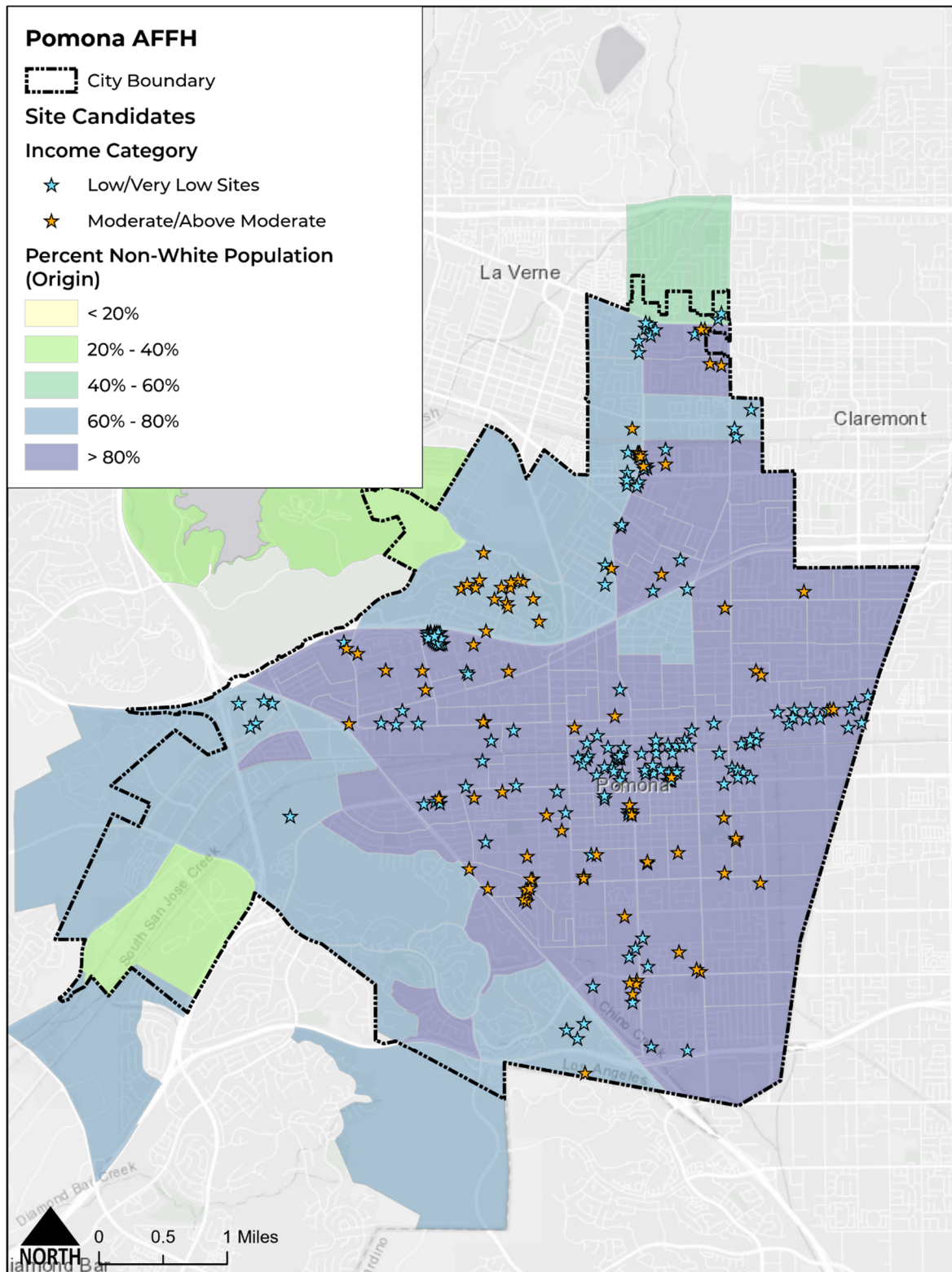
Figure D-28 shows the proposed candidate sites to meet the RHNA for Pomona in relation with census data showing the percentage of the population within each block group that is Non-white. **Figure D-28** shows the following findings:

- 2 proposed sites to accommodate the RHNA allocation (totaling 176 potential units, or 1.3% of the total potential units) are located within block groups that have a percentage of the population that identifies as Non-White between 40 and 60 percent. Of those units, 53 are proposed as affordable to low and very low incomes.
- 46 proposed sites to accommodate the RHNA allocation (totaling 3,114 potential units, or 22.9% of the total potential units) are located within block groups that have a percentage of the population that identifies as Non-White between 60 and 80 percent. Of those units, 974 are proposed as affordable to low and very low incomes.
- 203 proposed sites to accommodate the RHNA allocation (totaling 10,333 potential units, or 75.8% of the total potential units) are located within block groups that have a percentage of the population that identifies as Non-White above 80 percent. Of those units, 2,742 are proposed as affordable to low and very low incomes.

The data shows that the proposed candidate sites to meet the RHNA allocation are dispersed throughout the community with an emphasis on locating units where there is a high level of access to important public services and transit. The distribution of potential units does not disproportionately impact areas with larger concentrations of Non-white populations.



Figure D-28: Pomona Proposed RHNA Sites, Non-White, 2018



Sources: City of Pomona, HCD AFFH Data Viewer (March 2021)



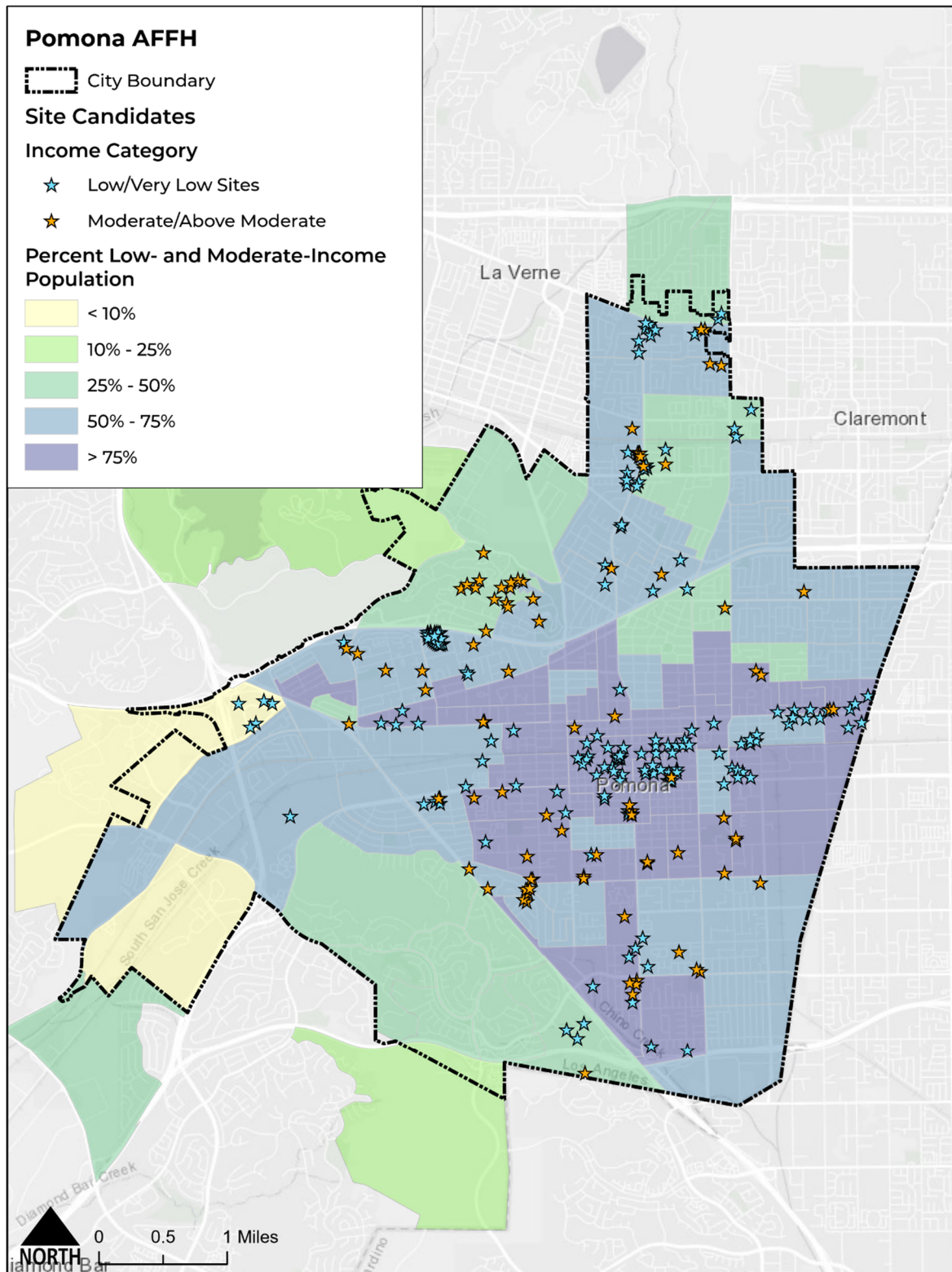
Figure D-29 shows location of proposed candidate sites to meet the RHNA for Pomona in comparison with census data showing the percentage of the population within each block group who is categorized as low income or moderate income by the American Community Survey. **Figure D-29** shows the following findings:

- 5 proposed sites to accommodate the RHNA allocation (totaling 629 potential units, or 4.6% of the total potential units) are located within block groups that have a percentage of the population that identifies as low-and moderate-income below 10 percent. Of those units, 178 are proposed as affordable to low and very low incomes.
- 33 proposed sites to accommodate the RHNA allocation (totaling 1,521 potential units, or 11.2% of the total potential units) are located within block groups that have a percentage of the population that identifies as low-and moderate-income between 25 and 50 percent. Of those units, 679 are proposed as affordable to low and very low incomes.
- 100 proposed sites to accommodate the RHNA allocation (totaling 4,980 potential units, 36.6% of the total potential units) are located within block groups that have a percentage of the population that identifies as low-and moderate-income between 50 and 75 percent. Of those units, 1,292 are proposed as affordable to low and very low incomes.
- 113 proposed sites to accommodate the RHNA allocation (totaling 6,493 potential units, or 47.7% of the total potential units) are located within block groups that have a percentage of the population that identifies as low-and moderate-income above 75 percent. Of those units, 1,620 are proposed as affordable to low and very low incomes.

The data shows that the proposed candidate sites to meet the RHNA allocation are evenly dispersed throughout the community with an emphasis on locating units where there is a high level of access to important public services and transit. The distribution of potential units provides increased opportunities for low-income housing in areas with higher rates of low-income persons.



Figure D-29: Pomona Proposed RHNA Sites, Low- and Moderate-Income Households 2015



Sources: City of Pomona, HCD AFFH Data Viewer (March 2021)



Figures D-30 through **Figure D-31** displays the sites identified to accommodate the City's RHNA within HCD AFFH opportunity maps.

Figure D-30 shows proposed candidate sites to meet RHNA for Pomona in relation with data showing R/ECAP areas within the City. R/ECAPs are racially or ethnically concentrated areas of poverty; they are marked in red hatchings. The goal of the AB 686 analysis is to analyze how the sites identified to accommodate the RHNA allocation may exacerbate or mitigate existing fair housing issues. **Figure D-30** shows the following findings:

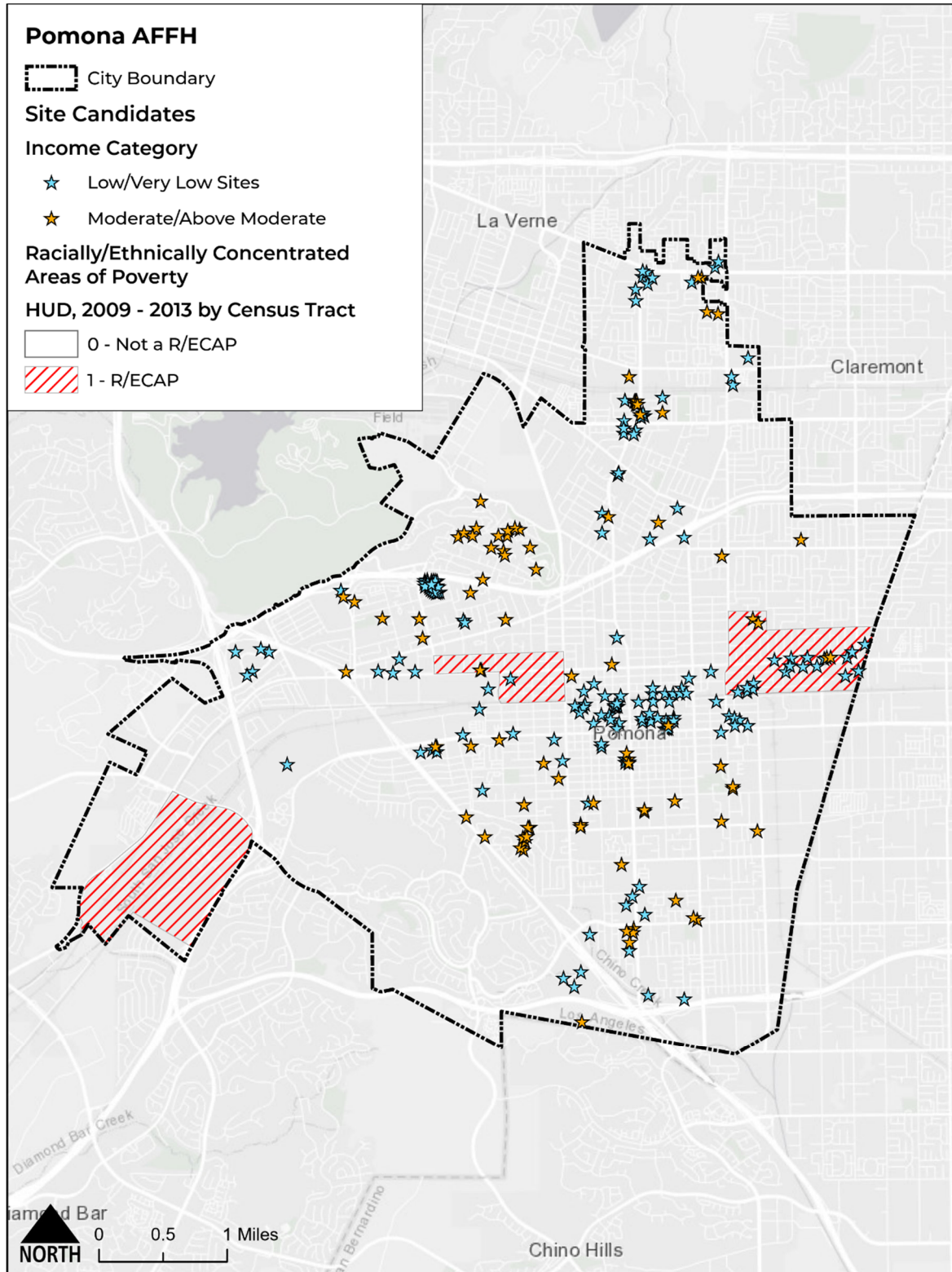
- 25 proposed sites to accommodate the RHNA allocation (totaling 2,413 potential units, or 17.7% of the total potential units) are located within R/ECAPs. Of those units, 600 are proposed as affordable to low and very low incomes.
- 226 proposed sites to accommodate the RHNA allocation (totaling 11,210 potential units, or 82.3% of the total potential units) are not located within R/ECAPs. Of those units, 3,170 are proposed as affordable to low and very low incomes.
- The potential addition of affordable housing units within the R/ECAP areas of the City allow for current lower income households to access affordable housing near high-scoring transit (as shown in **Figure D-12**), commercial necessities, and job opportunities.

Figure D-31 shows proposed candidate sites to meet RHNA for Pomona in relation with data showing RCAA areas within the City. RCAAs are racially or ethnically concentrated areas of affluence; they are identified as areas with a White Non-Hispanic population greater than 80 percent and a median household income greater than \$125,000.

There are no block groups identified as RCAAs with a White Non-Hispanic population greater than 80 percent in the City.



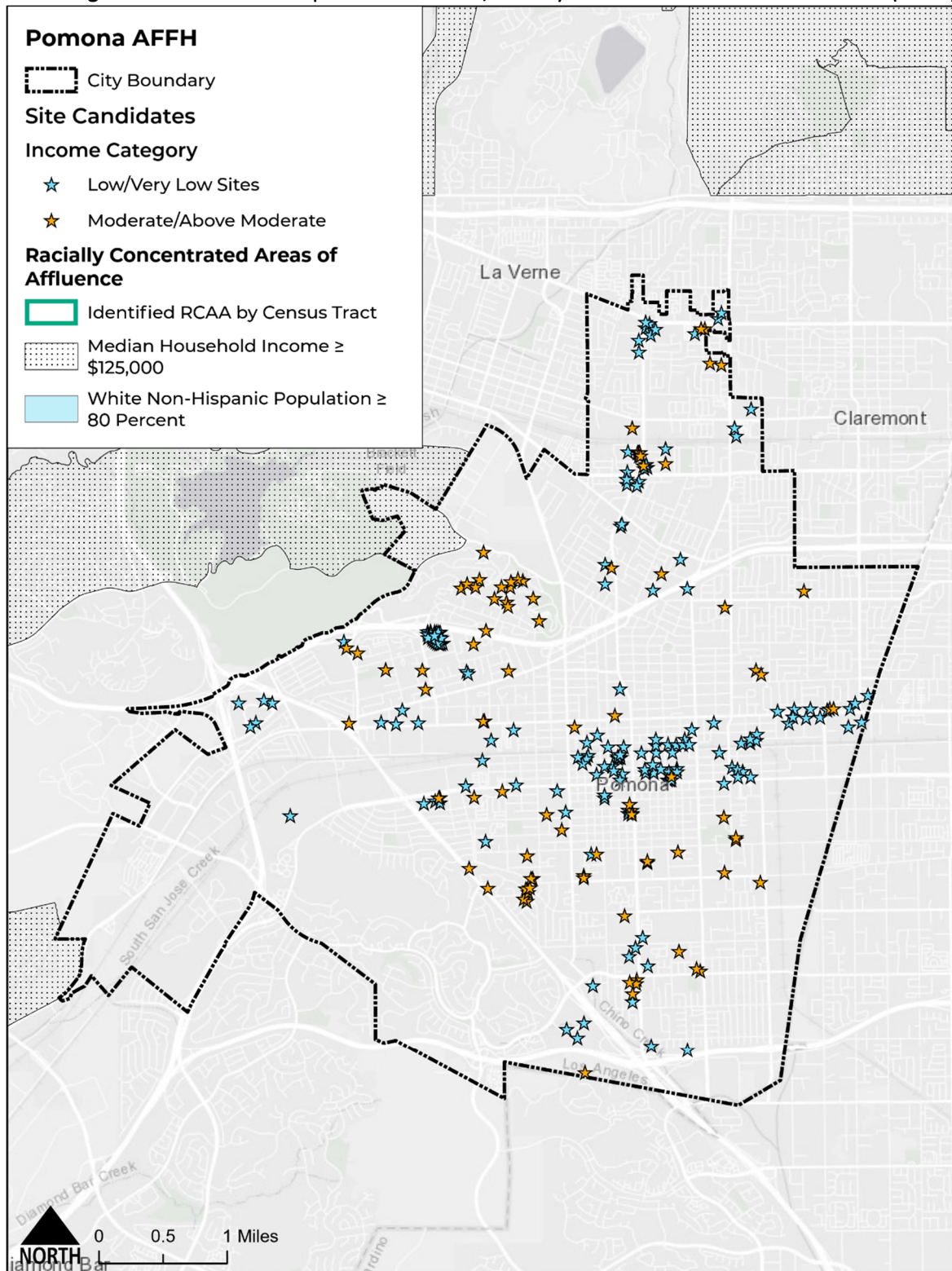
Figure D-30: Pomona Proposed RHNA Sites, Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)



Sources: City of Pomona, HCD AFFH Data Viewer (March 2021)



Figure D-31: Pomona Proposed RHNA Sites, Racially Concentrated Areas of Affluence (RCAA)



Sources: City of Pomona, HCD AFFH Data Viewer (March 2021)



Figure D-32 shows proposed candidate sites to meet RHNA for Pomona in relation with the TCAC/HCD Opportunity areas within the City. TCAC is the California Tax Credit Allocation Committee/Housing and Community Development Opportunity Area Maps which show how resources are spatially distributed throughout the City.

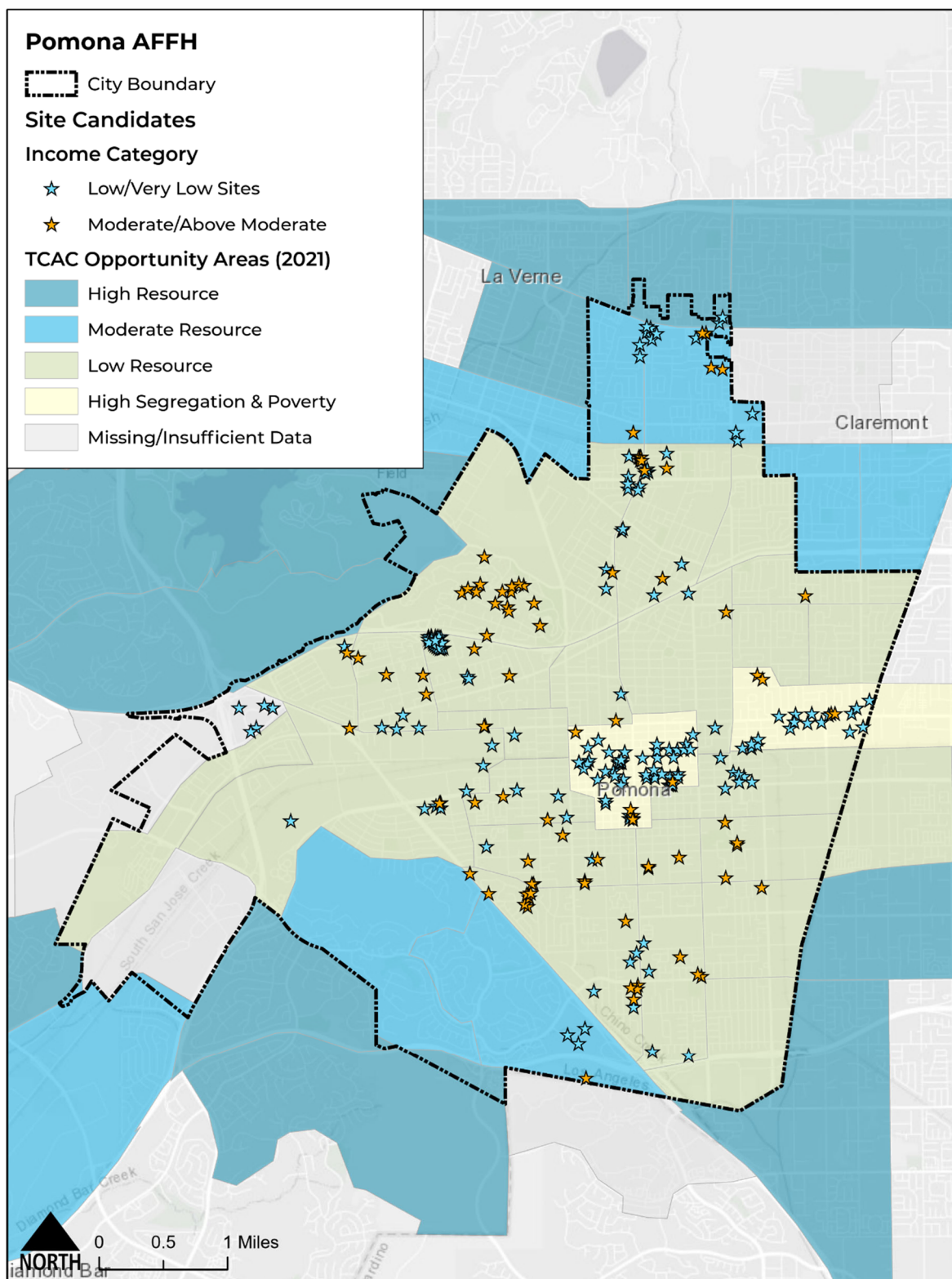
Figure D-32 shows the following findings:

- The City of Pomona is a primarily low to moderate resource City, with the majority of the City ranked as the low resource level.
- 2 proposed sites to accommodate the RHNA allocation (totaling 176 potential units, or 1.3% of the total potential units) are located within the High Resource areas of the City. Of those units, 53 are proposed as affordable to low and very low incomes.
- 20 proposed sites to accommodate the RHNA allocation (totaling 1,737 potential units, or 12.8% of the total potential units) are located within the Moderate Resource areas of the City. Of those units, 684 are proposed as affordable to low and very low incomes.
- 150 proposed sites to accommodate the RHNA allocation (totaling 6,117 potential units, or 44.9% of the total potential units) are located within the Low Resource areas of the City. Of those units, 1,533 are proposed as affordable to low and very low incomes.
- 74 proposed sites to accommodate the RHNA allocation (totaling 4,964 potential units, or 36.4% of the total potential units) are located within the High Segregation and Poverty areas of the City. Of those units, 1,321 are proposed as affordable to low and very low incomes.

There is a census tract in the western region of the City with no data available however there are 5 sites located within this area. The sites proposed within the High Segregation and Poverty areas of the City may provide new affordable housing opportunities for existing lower income households. This area may also provide housing opportunities near high-scoring transit (as shown in **Figure D-12**), commercial necessities, and job opportunities.



Figure D-32: Pomona Proposed RHNA Sites, TCAC Areas of Opportunity



Sources: City of Pomona, HCD AFFH Data Viewer (March 2021)



Figure D-33 show the proposed candidate sites to meet the RHNA for Pomona in relation to urban displacement data identifying areas at-risk or currently experiencing displacement within the City as categorized by the University of California Berkley Urban Displacement Project. The displacement typologies and criteria used to identify each category can be found in **Section D.B.6** of this document.

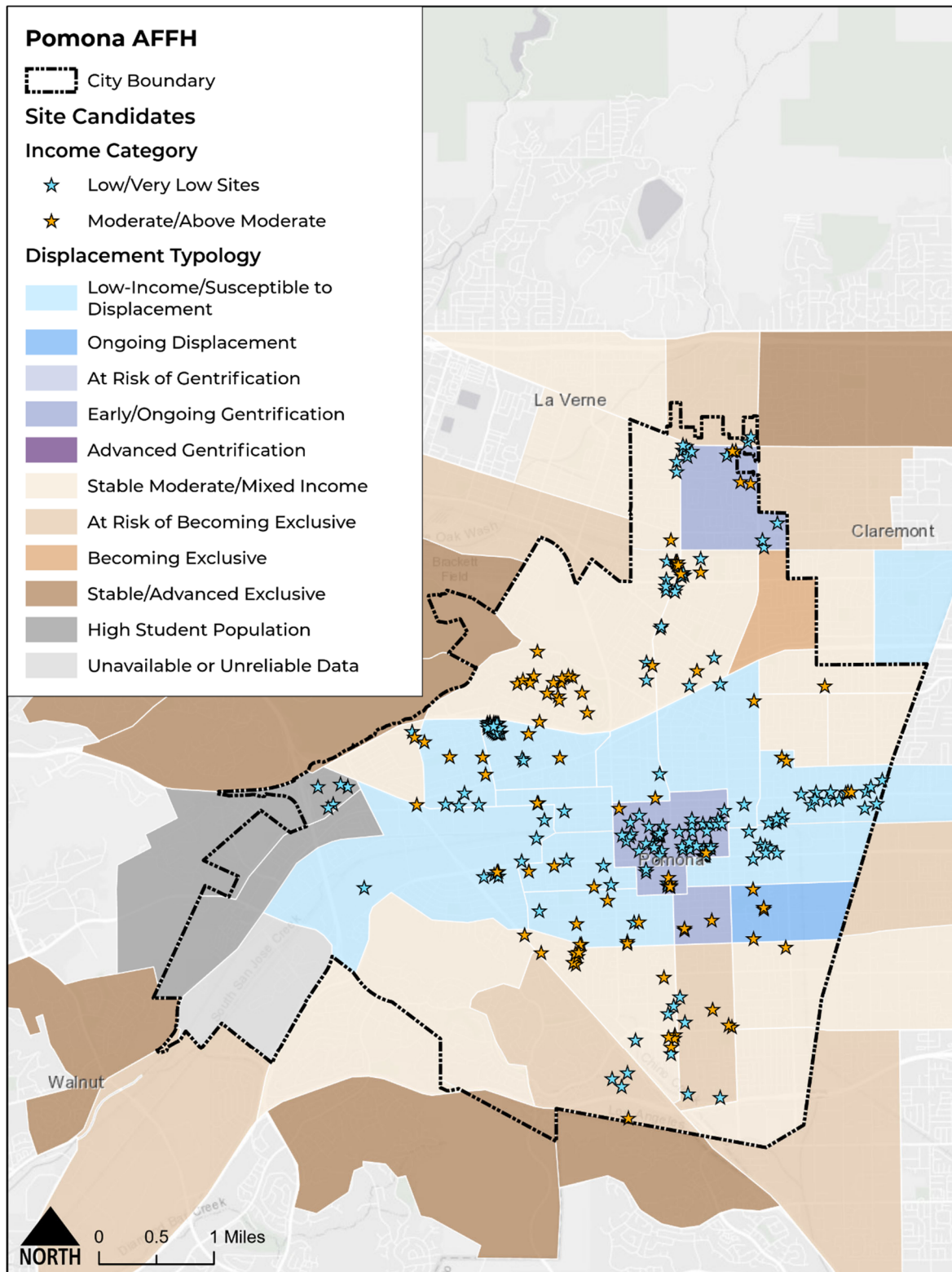
Figure D-33 shows the following findings:

- 13 proposed sites to accommodate the RHNA allocation (totaling 1,497 potential units, or 11.0% of the total potential units) are located within block groups that are at-risk of becoming exclusive. Of which, 746 are affordable to lower income households.
- 68 proposed sites to accommodate the RHNA allocation (totaling 3,551 potential units, or 26.1% of the total potential units) are located within block groups that are experiencing early/ongoing gentrification. Of which, 912 are affordable to lower income households.
- 5 proposed sites to accommodate the RHNA allocation (totaling 629 potential units, or 4.6% of the total potential units) are located within block groups that have high student populations. Of which, 178 are affordable to lower income households.
- 96 proposed sites to accommodate the RHNA allocation (totaling 5,067 potential units, or 37.2% of the total potential units) are located within block groups that are low-income/susceptible to displacement. Of which, 1,254 are affordable to lower income households.
- 4 proposed sites to accommodate the RHNA allocation (totaling 36 potential units, or 0.3% of the total potential units) are located within block groups that are experiencing ongoing displacement. None of which are affordable to lower income households.
- 65 proposed sites to accommodate the RHNA allocation (totaling 2,843 potential units, or 20.9% of the total potential units) are located within block groups that are stable moderate/mixed-income. Of which, 679 are affordable to lower income households.

The data shows that the proposed candidate sites to meet the RHNA allocation are evenly dispersed throughout the community with an emphasis on locating affordable units where displacement, exclusivity, or gentrification are occurring. There are a significant number of low- and very low-income sites located in areas at-risk of becoming exclusive, experiencing early or ongoing gentrification and displacement, are susceptible to displacement, or have high student populations. The placement of lower income housing within these areas of the City will provide increased affordable housing opportunities to mitigate the risk of displacement and gentrification as well as to decrease the instances of displacement that is currently occurring. Additionally, the majority of the City's lower income housing sites are designated to be mixed-income units which will not lead to the exacerbation of any concentrations of lower income populations within the City.



Figure D-33: Pomona Propose RHNA Sites, Urban Displacement



Sources: City of Pomona, HCD AFFH Data Viewer (March 2021)



It should be noted that the concentration of low- and very low-income sites located in the central region of the City as depicted in **Figures D-27 through D-33** above, are designated to be mixed income and would provide housing opportunity for both lower income households and moderate to above-moderate income households. Thus, the concentration of low- and very low-income sites located in the central region of the City would not exacerbate the current conditions in this area.

Integration and Segregation

The City of Pomona is predominately non-white with high concentrations of non-white residents throughout all but three census tracts located in small portions along the City's most northern, western, and southwestern boundaries. The sites inventory distributes the sites largely throughout the greater central region of the City. While the majority of the sites are located in predominately non-white areas, they are not disproportionately located in these areas in the context of the racial demographics of the City as a whole. There are a significant number of low- and very low-income and moderate- to above moderate-income sites located throughout the City's greater central region. These sites accommodate increased housing opportunity for all income levels and would not exacerbate the concentrations of non-white households.

Access to Opportunity

The majority of the City is considered low resource according to the TCAC Opportunity Map composite score. Thus, while the majority of the sites identified in the sites inventory are located in low resource areas, they are not disproportionately located in these areas in the context of the resource level of the City as a whole.

Transit

According to AllTransit the City of Pomona has a moderate transit performance score. The City has identified a significant number of lower income sites within the Corridor Specific Plan which encompasses land along the major east/west and north/south corridors. These major corridors intersect in the central region of the City. The City's central region is adjacent to the Downtown Metrolink Station and has a robust public transit network that is more accessible than other portions of the City. Households located within the Corridor Specific Plan and greater central region have better access to jobs and key destinations through transit than those located in the outer portions of the City. The majority of the low- and very low-income sites were strategically located within the Corridor Specific Plan area and throughout the greater central region to take advantage of the current transportation assets in these areas.

Education

The TCAC/HCD Opportunity Area Maps include education data representing the success of positive education outcomes determined by the following indicators: math proficiency, reading proficiency, high school graduation rate, and student poverty rate. These indicators are understood to reflect the quality of a census tract's schools as well as the conditions of the students' neighborhoods.⁹ The majority of the City

⁹ Methodology for the 2021 TCAC/HCD Opportunity Map, California Fair Housing Task Force, December 2020.



is considered to have low to moderate success in positive education outcomes, with higher instances of low positive education outcomes in the greater central region of the City.

In addition, the U.S. Department of Education provides financial assistance through Title I of the Elementary and Secondary Education Act to schools with high numbers or percentages of children from low-income families to help insure that all children meet challenging state academic standards. The City of Pomona has a total of 39 elementary, middle, and high schools of which 35 are designated as Title I schools. The City's 35 Title I schools serve a total of 19,537 students.

The identification of lower income and moderate to above moderate-income sites were distributed largely throughout the greater central region of the City to provide opportunity for households to access a variety of schools in Pomona. A significant amount of the lower income sites located around the central region of the City are designated as mixed income. The distribution of these sites may contribute to the success of positive educational incomes throughout the City as studies have shown that attending low-poverty and economically integrated schools boosts educational achievement for low-income students.¹⁰

Disproportionate Housing Needs

Income

The greater central region of the City has a high percentage of lower income households. The sites inventory accommodates a number of lower income sites throughout this region of City as there is a high level of access to important public services and transit there. The potential low- and very low-income sites within the central region will provide increased affordable housing opportunities where there are high rates of low-income residents. Additionally, there are a number of moderate- and above moderate-income sites located throughout the greater central region of the City as well to prevent exacerbating the concentrations of lower income households.

Overpayment

Pomona's households experience high rates of overpayment throughout the City as a whole. Homeowners in the northern and eastern regions of the City experience higher rates of overpayment and renters in the greater central region and to the south and west experience the highest rates of overpayment. Site selection emphasized infill and redevelopment throughout the Pomona Corridors Specific Plan and the Downtown Pomona Specific Plan areas to leverage existing zoned capacity, as well as to encourage residential development along corridors with access to public services and transit amenities. Housing located in these mixed-use areas with higher density allowances will facilitate more affordable units through mixed income development. The lower income sites associated with mixed income development throughout the City will provide access to supportive services such as job opportunities and transit amenities. Additionally, the placement of the lower income sites will ensure that there are affordable housing options in geographical areas that experience high rates of overpayment and may be susceptible to displacement.

¹⁰ Methodology for the 2021 TCAC/HCD Opportunity Map, California Fair Housing Task Force, December 2020.



Overcrowding

The central region of Pomona experiences the high rates of overcrowding and the downtown area experiences the highest rates of severe overcrowding. The placement of lower income and moderate- to above moderate-income sites within the central area will provide the opportunity for additional housing at all income levels to alleviate the impacts of overcrowding.

7. Assessment of Contributing Factors to Fair Housing in Pomona

Summary of Fair Housing Analysis

The analysis conducted in this section regarding fair housing issues within Pomona yielded the following conclusions:

- There are three racially or ethnically concentrated census tracts (RECAPs) within Pomona as identified by HUD. This indicates that there are three census tracts within the City with a non-white population of 50 percent or more or any census tracts that have a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan area.
- The UC Davis Regional Opportunity Index shows that the majority of residents within Pomona have a moderate to low level of access to opportunity throughout the City. Additionally, analysis of the TCAC/HCD opportunity Area Maps show that all census tracts in Pomona are classified with the “Low to Moderate Resource” designation. This indicates that these census tracts may lack essential mobility, retail/food, economic, housing, or civic resource that may promote upward mobility and result in healthier neighborhoods.
- The City provides moderate transit trip opportunity, additionally, about 90% of all city jobs are within ½ mile of transit but just under 3 percent of the working population uses public transit as a primary source of transportation.
- The City has demonstrated the ability to meet the anticipated future affordable housing needs of the community through the designation of sites to meet the very low and low income RHNA need (**Appendix C: Candidate Sites and Housing Resources**). These sites are dispersed throughout the community.
- There are 466 current units with affordable covenants at risk of converting to market rate before the year 2029 in the City.
- The CalEnviro Screen mapping tool (2018) identified most of the City as moderate to high scoring, indicating high pollution levels, some of which overlap with identified R/ECAPs in the City.

Key Findings from Fair Housing Analysis

As a part of the Housing Element, the City considers protected class (such as race, ethnicity, income, etc.) and opportunity indicators as key factors in fair housing. Federal, state, and local data provide regional context, background information and supportive data which helps the City to understand fair housing issues and to identify key fair housing factors for Pomona. The section below uses available data to identify key



trends and local contributing factors for fair housing, key themes identified through this analysis are stated below:

- Persons who identify as Native Hawaiian or American Indian experience the highest levels of segregation with persons who identify as White in the City of Pomona.
- Pomona has two significant pockets of racial or ethnic concentrations of poverty, both are located in the central portion of the City.
- Pomona has a lower percentage of college educated residents than the state but a comparable percentage of quality job and economic access for residents.
- Pomona is identified as having poor air quality throughout the City, notably, it has significantly lower air quality than the overall state.
- Compared to the state, residents in Pomona have lower voting rates and an overall lower percentage of citizenship.
- About 90 percent of jobs in Pomona are accessible by public transit. Pomona's overall environmental health and quality is considered low.

Local Contributing Factors

There are a number of factors and elements that contribute to and cause fair housing issues. The following lists a number of contributing factors within the City of Pomona:

- **Public Investment in Specific Neighborhoods** – The City of Pomona is considered a low resource region, as illustrated in **Figure D-9**. The majority of the City is measured at low opportunity levels, with some moderate and two high opportunity census tracts. The TCAC/HCD Opportunity Area Map (**Figure D-9**) also reports two areas with high segregation and poverty surrounded by areas of low resources. When compared to the CalEnviroScreen map in **Figure D-13**, the low resource areas align with regions identified at the highest degree of pollution burdens. Various Housing Programs have been adopted to allocate public investment historically underinvested neighborhoods. Housing Goal # 2: Partnerships, Government Funding, and Education is meant to address issues of public investment in historically underinvested neighborhoods.
- **Availability of Affordable Housing** – **Appendix A.1** of this Housing Element provides details on household income throughout the City of Pomona. Approximately 61.5 percent of households in the City are categorized as earning a lower income (less than 80 percent of the MFI). This represents 23,905 total households. Additionally, the City's median income falls 10.9 percent below the regional median. In comparison, the City currently has 1,077 affordable units with covenants protecting the affordability. Various Housing Programs have been adopted to facilitate the development of affordable housing and a variety of housing to all incomes and household sizes. Housing Goals #1: Land Use Regulations and #5: Fair Housing will bring more affordable housing and varying housing types to market.
- **Opportunities for Persons with Disabilities** – The City's AI lists disability and access as fair housing issues in Pomona. In comparison to **Figure D-15**, the City shows a moderate portion of residents report at least one disability. As the City is considered a low opportunity area, residents with disabilities may have lower access to resources and information. Housing Goal #5: Fair Housing is meant to address fair housing issues and opportunity access for members of the community.



8. Analysis of Fair Housing Priorities and Goals

To enhance mobility and promote inclusion for protected classes, the chief strategy included in this housing element is to provide sites suitable for affordable housing in high-resource, high opportunity areas, as demonstrated by the analysis of the housing resource sites contained in **Appendix C: Housing and Financial Resources**. Other programs that affirmatively further fair housing and implement the AI's recommendations include:

- Program 1.1A: Adequate Sites Inventory
- Program 1.2A: Pomona Zoning Ordinance Update
- Program 1.3A: By-Right Housing Analysis
- Program 1.4A: Inclusionary Housing
- Program 1.4B: Housing Density Bonus
- Program 2.1A: Strategic Plan to Combat and End Homelessness
- Program 2.1B: Interim and Transitional Rental Assistance
- Program 2.2A: Housing Choice Vouchers
- Program 2.2B: Family Self-Sufficiency Program
- Program 2.4B: Housing Improvement Program
- Program 2.4D: Individual Mobile Home Units
- Program 2.5A: Community Land Trust
- Program 2.6A: Community Housing Development Organization Assistance
- Program 2.5B: Affordable Housing Trust Funds
- Program 2.7A: Preservation and Monitor At-Risk Housing & All Affordable Units
- Program 2.7C: Fair Housing Assistance Program
- Program 3.4A: Rent Stabilization Feasibility Study
- Program 3.4B: Local Tenant Protection Regulation Study
- Program 4.1A: Citywide Complete Streets Ordinance
- Program 4.1A: Local Serving Resources
- Program 5.1A: Housing for Persons with Disabilities
- Program 5.1B: Affirmatively Further Fair Housing
- Program 5.1C: Fair Housing Outreach
- Program 5.4A: Affordable Housing Opportunities Information